

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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ALEXANDER WILLIAMS JR

PLAINTIFF(S)

-AGAINST-

CITY OF NEW YORK, LOUIS MOLINA, ERIC ADAMS, ERICA GAINOUS, KEVIN YOUNG, PRESTON RITTER, ANDREW HICKSON, KEVIN WHITE, WARDEN JEAN RENEE, WARDEN COURT, CAPTAIN FERNANDEZ, CAPT WIGFALL, DW EBONEE FLEMING, DW [REDACTED] JONELLE SHIVRAJ, DW TIFFANY MORALES, DW LISA BARNBEY, DW JOANNE MATOS, ANTONIO GRAVES, ESU OFFICER RICHARDSON SHIELD NO. 254, CO RAHMAN SHIELD 11383, SRT OFFICER VEST NUMBER 57 ( THIS IS OFFICER VEST NUMBER FROM AUGUST 31, 2022 INCIDENT) SRT OFFICERS VEST NUMBERS 74, 75, 78, 79, 80, 88, 82, 111, 113, 112, 117, 135 SHIELD NO 8957, 139, 102, 120, 108, 182, SRT CAPTAIN VEST NUMBERS #1, 3, & 4, ASSISTANT COMMISSIONER MILLER, ASSIATNT COMMISSIONER THOMAS GRIFFIN, CIB ADW GWINNIE, CIB CAPT FLUKA, WARDEN COLLINS, DW MILLER, CAPT BERNARD MATHIS, CAPT LOPEZ SHIELD 462, CO PHILLIPS SHIELD NO 12252, CO ANDERSON, RECREATION CAPT FROM JAN 7, 2023, ESU CAPT RIVERA, ESU CAPT VEST NUMBER 28, ESU SECRATY OFFICER SHIELD 4190 (NAME UNKNWON), CIB OFFICER (NAME UNKNWON FEMALE WHITE DIRTY BLONDE HAIR HEIGHT 5'5) , CO ORELLANA (HQ) K-9 OFFICER PERPIGNAN (SHIELD UNKNWON) CAPT RIVERA SHIELD 1230(GRVC), CAPT GUAN SHIELD 367 (GRVC), CAPT PALMERO SHIELD 1888, CO BAWA SHIELD 1812, CO MARDEN SHIELD 13770, CO HO SHIELD 17626, CO RODRIGUEZ SHIELD 9067, CO WOLOSKI SHIELD 5460, CAPT JOSEPH (GRVC), SRT 139, 203, CAPT WIGFALL,

SUED IN THEIR INDIVIDUAL AND OFFICIAL CAPACITIES

DEFENDANT(S)

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CIVIL ACTION NO. 22-CV-10637 (JHR)

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TRIAL REQUESTED

-SECOND AMENDED COMPLAINT-

PURSUANT TO: 42 U.S.C. § 1983, 42 U.S.C. 1985, 42 U.S.C. § 1986, 42 U.S.C. § 2000cc, 42 U.S.C. § 2000aa et. Seq, 42 U.S.C. 2000dd, AMERICAN DISABILITY ACT, NEW YORK CITY ADMIN CODE § 9-108(c), CORRECTION LAW § 500-C(4), RULE OF NEW YORK 40 §§ 3-02

PRELIMINARY STATEMENT:

Plaintiff commences this action seeking punitive, compensatory, declaratory, preliminary releif and damages against the defendants named herein, to be sued in thier individual and official capacities for violation of his state and federal rights while acting under color of law pursunatt 42 U.S.C 1983.

Plaintiff asserts supplemental state law claims against the defendnatsas well, for violations of their statutory and common law duities, as well as claims of retalaiton, negligence, negligent hiring , training, supervision and rention, inentional emotional distress

At all times herein, plaintiff was and remains a pretrial detainee confined to the custody, control and care of the **CITY** of New York as its Department of Corrections ' various jails, who has been sexually assaulted and abused and forcibly touched without his consent.

New York State has long recognized the coercive power of correctional officers over incarcerated individuals and the related risk of abuse.

### **JURISDICTION AND VENUE:**

Jurisdiction of the Court is invoked pursuant to 28 U.S.C.1331 and 1343(a) (3) and (4) and the aforesaid statutory and constitutional provisions.

Pursuant to 28 U.S.C. 1367, this Court has supplemental jurisdictions over claims, which arise under relevant provisions of New York State Law.

Venue is appropriate in this Court pursuant to U.S.C. 1391(b) (2) as a substantial part of the events or omissions giving rise to this claim that occurred within Bronx County New York, which is within this Court's jurisdiction.

### **PARTIES:**

At all times mentioned herein, the Plaintiff was and remains a resident of the State of New York.

At all times mentioned herein, the plaintiff was and remains a pretrial detainee confined to the custody, control and care of defendant **CITY OF NEW YORK** and its department of correction.

Upon information and belief, and at all times mentioned herein, the defendant, **CITY OF NEW YORK** (hereinafter referred to as "**CITY**"), was and remains the body of corporate and

public, constituting a Municipal corporation duly organized and existing under and virtue of the laws of the State of New York.

Upon information and beliefs, and at all times mentioned herein, the **CITY** maintains the **CITY** of New York Department of Correction (**hereinafter referred to as "DOC"**), pursuant to law.

Upon information and beliefs, and at all times mentioned herein, defendant **CAPTAIN GANIES** was a correction official employed by the defendant **CITY** holding the position of security captain.

Upon information and beliefs, and at all times mentioned herein, defendant **CAPTAIN WIGFALL** was a correction official employed by the defendant **CITY** holding the position of security captain.

Upon information and beliefs, and at all times mentioned herein, defendant **SSRT CAPTAIN FERNANDEZ** was a correction official employed by the defendant **CITY** holding the position of security captain.

Upon information and beliefs, and at all times mentioned herein, defendant **CO ANDRE HICKSON** was a correction official employed by the defendant **CITY**.

Upon information and beliefs, and at all times mentioned herein, defendant **CO KEVIN YOUNG** was a correction official employed by the defendant **CITY**.

Upon information and beliefs, and at all times mentioned herein, defendant **CO KEVIN WHITE** was a correction official employed by the defendant **CITY**.

Upon information and beliefs, and at all times mentioned herein, defendant **DEPUTY WARDEN FLEMMING** was a correction official employed by the defendant **CITY**.

Upon information and beliefs and at all times mentioned herein the defendant SRT vest number 57, was employed by the defendant CITY holding the position of correction officer(THIS IS THE DEFENDANT FROM AUGUST 31, 2022 INCIDENT MENTIONED HEREIN THIS COMPLAINT)( PLAINTIFF WAS ABLE TO OBTAIN THIS INFORMATION AFTER SEEING THIS DEFENDANT AGAIN AT A LATER DATE.

Upon information and beliefs at all times mentioned herein defendant MILLER was employed by defendant CITY holding the position of ASSISTANT COMMISSIONER.

Upon information and beliefs and at all times mentioned herein defendant THOMAS GRIFFIN was employed by defendant CITY holding the position of ASSISTANT COMMISSIONER.

Upon information and beliefs and at all times mentioned herein defendant MILLER was employed by defendant CITY holding the position of DEPUTY WARDEN of NIC and WEST FACILITY.

Upon information and beliefs and at all times mentioned herein defendant JEAN RENEE was employed by defendant CITY holding the position of WARDEN

Upon information and beliefs and at all times mentioned herein defendant COLLINS was employed by defendant CITY holding the position of WARDEN.

Upon information and beliefs and at all times mentioned herein defendant COURT was employed by defendant CITY holding the position of WARDEN.

Upon information and beliefs and at all times mentioned herein defendant LISA BARNBEY was employed by defendant CITY holding the position as DEPUTY WARDEN.

Upon information and beliefs and at all times mentioned herein defendant JOAANE MATOS was employed by defendant CITY holding the position as DEPUTY WARDEN.

Upon information and beliefs and at all times mentioned herein defendant JONELLE SHIVRAJ was employed by defendant CITY holding the position as DEPUTY WARDEN.

Upon information and beliefs and at all times mentioned herein defendant TIFFANY MORALES was employed by defendant CITY holding the position as DEPUTY WARDEN.

Upon information and beliefs and at all times mentioned herein defendant LUOIS MOLINA was employed by defendant CITY holding the position of COMMISSIONER.

Upon information and beliefs and at all times mentioned herein defendant DOCTOR DUVERN, was employed by defendant CITY maintaining the position as a DOCTOR under New York City Health and Hospitals.

Upon information and beliefs and at all times mentioned herein defendant ERIC ADAMS was employed by defendant CITY holding the RANKING as MAYOR. In control of all city jails including Rikers <sup>Island</sup> ~~xxxx~~ facility were violations occurred.

Upon information and beliefs and at all times mentioned herein defendant RAHMAN shield 11383 was employed by defendant CITY holding the position as ~~xxxx~~ correction officer.

Upon information and beliefs and at all times mentioned herein defendant RICHARDSON shield 254 was employed by defendant CITY as an ESU correction officer on October 26, 2022 when incident occurred mentioned herein.

Upon information and beliefs and at all times mentioned herein defendant RIVERA shield 1230 was employed by defendant CITY holding the position as CAPTAIN at GRVC facility.

Upon information and beliefs and at all times mentioned herein defendant GAUN shield 367 was employed by defendant CITY holding the position of CAPTAIN at GRVC facility.



Upon information and beliefs and at all times mentioned herein defendant PALMERO shield 1888 was employed by defendant CITY holding the position as CAPTAIN at GRVC facility.

Upon information and beliefs and at all times mentioned herein defendant RODRIGUEZ was employed by defendant CITY with shield number 9067 holding the position as correction officer.

Upon information and beliefs and at all times mentioned herein defendant WOLOSICKI shield 5460 was employed by defendant CITY holding the position of correction officer.

Upon information and beliefs and at all times mentioned herein defendant BAWA shield 1812 was employed by defendant CITY holding the position of correction officer.

Upon information and beliefs and at all times mentioned herein defendant HO shield number 17626 was employed by defendant CITY maintaining the position of correction officer.

Upon information and beliefs and at all times mentioned herein defendant MARDEN shield number 13770 was employed by defendant CITY holding the rank as correction officer.

Upon information and beliefs and at all times mentioned herein defendant ANDERSON shield unknown was employed by defendant CITY holding the position as correction officer (THIS DEFENDANT CONDUCTED RECREATION AT WEST FACILITY SPRUNG SIX ON JAN 7, 2023).

Upon information and beliefs and at all times mentioned herein defendant Name unknown shield unknown was employed by defendant CITY holding the RANK as CAPTAIN AND DID RUN RECREATION ON THE MORNING OF JAN 7, 2023 WITH DEFENDANT ANDERSON.

Upon information and beliefs and at all times mentioned herein defendant JOSPEH was employed by defendant CITY holding the position of CAPTAIN at the GRVC facility.

Upon information and beliefs and at all times mentioned herein defendant RIVERA was employed by the defendant CITY holding the position of CAPTAIN with the Emergency Service Unit was the Department Of Correction.

Upon information and beliefs and at all times mentioned herein defendant PHILLIPS shield 12252 was employed by defendant CITY holding the position as correction officer.

Upon information and beliefs and at all times mentioned herein defendant BERNARD MATHIS was employed by defendant CITY holding the position as SRT CAPTAIN.(shield no. 82 )

Upon information and beliefs and at all times mentioned herein defendant LOPEZ shield 462 was employed by defendant CITY holding the position as SRT CAPTAIN.

Upon information and beliefs and at all times mentioned herein defendant PERPIGNAN was employed by defendant CITY holding the position as K-9 correction officer.

Upon information and beliefs and at all times mentioned herein defendant name unknown was employed by defendant CITY as a ESU CAPTAIN with number 28 on vest at the New York City department of Correction.

Upon information and beliefs and at all times mentioned herein defendant FLUKA was employed by defendant CITY holding the rank of CAPTAIN with the CIB division of the New York City Department of Correction.

Upon Information and beliefs and at all times mentioned herein defendant GWINNIE was employed by defendant CITY holding the RANK as Assistant Deputy Warden with the CIB division of the New York City Department of Correction.

Upon information and beliefs and at all times mentioned herein defendant NAME UNKNOWN shield number 4190- was employed by defendant CITY holding the position of correction officer with the Emergency service Unit division of the New York City Department of Correction.

THE BELOW LISTED DEFENDANT ARE NAMED BY THE NUMBER THAT ARE ON THE BACK OF THE DEPARTMENTAL VEST WORN BY THESE DEFENDANT OF THE STRATEGIC RESPONSE TEAM:

Upon information and beliefs and at all times mentioned herein defendant SRT 1 was employed by defendant CITY as a SRT officer holding the rank of CAPTAIN .

Upon information and beliefs and at all timesd mentioned herein defendant SRT 3 was employed by defendant CITY holding the rank of a SRT CAPTAIN.

Upon information and belifs and at all times mnetioned herein defendant SRT 4 was employed by defendant CITY holding the position as CAPTAIN with the Strategic Response Team.

Upon information and beliefs and at all times mebntioned herein defendant SRT 139 was employed by defendant CITY holding the position as correction officer in the Strategic Response Team.

Upon information and belifes and at all times mentioned herein defendant SRT 135 sheild 8957 was employed by defendant CITY holding the position as correction officer with the Stratgic Response Team

Upon information and beliefs and at all times mentioned herein defendant SRT 102 was employed by defendant CITY holding position of correction officer with the strategic Response Team.

Upon information and beliefs and at all times mentioned herein defendant SRT 120 was employed by defendant CITY holding the poistion of correction officer with the Strategic Response Team.

Upon information and belifs and at all times mentioned herin defendant SRT 182 was employed by defendant CITY as correction officer with the Strategic Response Team.

Upon information and beliefs and at all times mentioned herein defendant SRT 78, was employed by defendant CITY holding the position as correction officer with the Strategic Resoponse Team.



Upon information and beliefs and at all times mentioned herein defendant SRT 79, was employed by defendant CITY holding the position as correction officer with the Strategic Response Team.

Upon information and beliefs and at all times mentioned herein defendant SRT 74, was employed by defendant CITY holding the position of correction officer with the Strategic Response Team.

Upon information and beliefs and at all times mentioned herein defendant SRT 75, was employed by defendant CITY holding the position of correction officer with the Strategic Response Team.

Upon information and beliefs and at all times mentioned herein defendant SRT 77, was employed by defendant CITY holding the position of correction officer with the Strategic Response Team.

Upon information and beliefs and at all times mentioned herein defendant SRT 65, was employed by defendant CITY holding the position of correction officer with the Strategic Response Team.

Upon information and beliefs and at all times mentioned herein defendant SRT 80 was employed by defendant CITY holding the position of correction officer with the Strategic Response Team.

Upon information and beliefs and at all times mentioned herein defendant SRT 82 was employed by defendant CITY holding the position as correction officer with the Strategic Response Team.

Upon information and beliefs and at all times mentioned herein defendant SRT 88 was employed by defendant CITY holding the position of correction officer with the Strategic Response Team.

Upon information and beliefs and at all times mentioned herein defendant SRT 203 was employed by defendant CITY holding the position of correction officer with the Strategic Response Team.

Upon information and beliefs and at all times mentioned herein defendant SRT 111 was employed by defendant CITY holding the position of correction officer with the Strategic Response Team.

Upon information and beliefs and at all times mentioned herein defendant SRT 113, was employed by defendant CITY holding the position of correction officer with the Strategic Response Team.

Upon information and beliefs and at all times mentioned herein defendant SRT 117, was employed by defendant CITY holding the position of correction officer with the Strategic Response Team.

Upon information and beliefs and at all times mentioned herein defendant SRT 112, was employed by defendant CITY holding the position of correction officer with the Strategic Response Team.

### **STATEMENT OF FACTS:**

On Monday August 29, 2022 the plaintiff, informed housing unit staff that his toilet was stopped up and that feces was floating in the toilet and that he need the plumber to be called.

The plaintiff was allowed to use the bathroom in another cell but he was never allowed to clean his cell toilet or be moved to another cell, which he was told could only be done by defendant **CAPTAIN GANIES** because of her ranking of security captain at the facility.

These leads to the plaintiff having to sleep eat and remain in a cell 23 hours a day with these feces.

On Monday August 29, 2022, the plaintiff received a letter from his wife Crystal Williams informing him that she had been diagnosed with breast Cancer. The plaintiff broke down and informed mental health personnel on how he was feeling, see housing unit log book 8/29/2022 page 91 entry 8:00pm.

On Tuesday August 30<sup>th</sup>, 2022 at approx 7:10pm co Serrano shield Number 12439 notified Captain Gaun and mental health staff that the plaintiff was acting erratic and seemed to be depressed and need assistance from medical personnel, see housing unit log book at \* page 94.

On August 30, 2022 the plaintiff, informed housing unit staff that his toilet was stopped up and that feces was floating in the toilet and that he need the plumber to be called.

The plaintiff was allowed to use the bathroom in another cell but he was never allowed to clean his cell toilet or be moved to another cell, which he was told could only be done by defendant **CAPTAIN GANIES** because of her ranking of security captain at the facility.

This lead to the plaintiff having to sleep eats and remain in a cell 23 hours a day with these feces.

On Wednesday August 31, 2022 at approximately 10:30am, Captain Mitchell was escorting the plaintiff to the clinic area because Mental Health Personnel called him down after they were informed that he was having some mental health episode.

While walking out of the housing unit and towards building 2 inner gate an SRT team appeared being lead by defendant **CAPTAIN FERNANDEZ** who stopped the captain Mitchell and asked where the plaintiff was going.

Captin Mitchell explained that he was escorting the plaintiff to the facility clinic area for a medical callout which the SRT officer that was in the front (description is 6'3, slender built, long hair of dreads, light skinned) stated that the plaintiff is not allowed in the facility clinic area due to NYC DOC policy and him being a court ordered locked down inmate and that he did not care if the plaintiff was going crazy. The policy can be seen in Ex-A (page 4 - 6)

Ignoring the information that they were given from Captain Mitchell he explained that the plaintiff needed IPC and CIT (both ackroms unknown to the plaintiff), he SRT team and captain ordered that the gate be open and started advancing towards the plaintiff in a threatening manner while screaming under their mask that **"I KNOW YOU", " YOU ARE THE GUY WITH THE LAW SUITS AM GOING TO FUCK YOU UP TODAY"**.

It is important to note that the SRT team member who made this statement was standing with defendant **CAPTAIN FERNANDEZ**.

The plaintiff was threatened by these SRT team and defendant **CAPTAIN FERNANDEZ**, and was only saved from a physical attack by this team by the actions of CO Serrano shield 12439, who was working the housing unit who forced the plaintiff back towards him and away from the advancing SRT team, who had taken notice that the SRT team member with the dreads was within inches of the plaintiff and had his hands out in an attack formation and was also able to hear this SRT Defendant (**WITH DREADS**) was still talking under his mask about having an issue with the plaintiff's law suit and needing to be taught a lesson.

**(PLEASE PRESEVE THE CAMERA FOOTAGE FROM HALLWAY AREA OUTSIDE OF HOUSING UNIT 2A ON THE DATE OF AUGUST 31, 2022)**

The retreated to his cell and contacted his attorney ERIC ABRAMS Esq. from Paul, Weiss, Rikfind, Wharton & Garrison LLP and informed them of what had just occurred because of the fact that he had an civil manner that was close to trial that involved an SRT Captain by the name of Bernard Mathis in the matter of **ALEXANDER WILLIAMS V. CITY OF NEW YORK ET AL. 19-CV-3347 (LJL)**.

The plaintiff also sent a letter for preservation to CITY Attorney's and to Magistrate Judge Katherine H. Parker from the Southern District in the matter of **ALEXANDER WILLIAMS V. CITY OF NEW YORK ET AL. 22-CV-3819 (PGG) (KHP)**. This letter can be seen herein as EX-C. (supporting an ongoing campaign of retaliation due to the plaintiff filing of law suits and publishing of a book titled "THE TRUE UNTOLD STORY OF NEW

**YORK CITY'S NOTORIOUS RIKERS ISLAND", both which are acts protected by the First Amendment of the Const.)**

On August 31<sup>st</sup>, 2022 the plaintiff informed housing unit staff that his toilet was stopped up and that feces was floating in the toilet and that he need the plumber to be called.

The plaintiff was allowed to use the bathroom in another cell but he was never allowed to clean his cell toilet or be moved to another cell, which he was told could only be done by defendant **CAPTAIN GANIES** because of her ranking of security captain at the facility.

This lead to the plaintiff having to sleep eat and remain in a cell 23 hours a day with these feces.

On September 20, 2022 at 8:10am the plaintiff awoke to a gall bladder attack where he was having issues breathing, was vomiting and passing his bowels without being able to control them.

CO Pierce immediately called a medical emergency and informed the plaintiff that someone from outside of the facility had called the bubble station approximately 5:00am that morning inquiring if he was on the production list for Bellevue hospital.

At that time deputy warden Phillips called CO Pierce and instructed him not to bring the plaintiff to the facility Clinic because she did not care if he was dying, that she had to enforce the facility command level order for Court Ordered Lockdown Housing Unit that states that Court Ordered Inmate are not allowed in the facility clinic area. See Ex-A



CO Pierce informed Deputy Warden Phillips that the plaintiff seemed to be in bad shape and he defied Deputy Warden Phillips orders and called over the facility wide walike talkie for a medical emergency.

Roughly, an hour and a half later the plaintiff was being escorted to the facility clinic with chronic abdomen pain and vomiting.

While a CO Gomez stopped, being escorted to the facility clinic the plaintiff who is the Warden's executive sectary and informed that he and the warden had received an email at 5:45am in regards to the plaintiff missing numerous hospital appointments for surgery in his gallbladder.

CO Gomez escorted the plaintiff to the facility clinic where he was seen by Dr. Asari and informed that his Gallbladder matter was dire and he needed to go to the hospital as soon as possible. During the medical examination another Dr. Informed both Dr. Asari and the plaintiff that was wanted in a separate booth in the clinic area for tele-health where the surgery doctor from Bellevue hospital wanted to know why the plaintiff was not produced in the hospital for his scheduled surgery.

This was an ongoing matter where as Ex-B where the plaintiff was supposed to be produced to Elmhurst Hospital on September 15<sup>th</sup> 2022 for removal of his Gallbladder after doctor found that it needed to be removed before causing the plaintiff a life threatening medical issue.

At 10:30am, CO Gomez and Captain Wilmer escorted the plaintiff to the facility intake area while Deputy Phillips who was the facility tour commander that morning. When the plaintiff was taken into the intake area and Defendant **CAPTAIN WIGFALL** ran over to the

plaintiff and began cursing at him and becoming physical with him stating that he wanted him out of his intake and that he would "BREAK HIS NECK & DIDN'T CARE ABOUT THE PLAINTIFF BOOK OR LAWSUIT".

The plaintiff asked him what was the issue that he had never done anything to him and that he was in dire pain and was escorted by the warden secretary and captain Wilmer here why was not he addressing them.

Defendant **CAPTAIN WIGFALL** response was fuck you and the warden this is my intake area I do not care about your medical emergency or if you die, what I care about is your lawsuits. At that point, another officer who is unknown to the plaintiff stated to defendant **CAPTAIN WIGFALL** that he did not want to be part of what he was seeing after the incident leading to the arrest of correction staff.

On September 20<sup>th</sup> 2022 Deputy Warden Tindale, Captain Wilmer and defendant **CAPTAIN GANIES**, stated that "YES" *"I am weapons certified and I could take you to the hospital but right now I do give a fuck if you die because you placed by business in your book, hope you live to put this in Part II"*, at 11:45am when the three of them were summoned to the housing unit due to a level B being active when the plaintiffs' pains became unbearable and housing unit officers did not know what else too.

As promised by defendant **CAPTAIN GANIES** the plaintiff was not taken out of the facility until 4:00pm after enduring over 8 hours of unbearable pain from a Gallbladder infection.

On September 30, 2022 at approximately 11:45 am defendants **CO ANDRE HICKSON**, **CO KEVIN WHITE AND CAPTAIN GANINES** entered the housing unit of 2a at the GRVC facility and ordered the plaintiff to lock into his cell while he was conducting the feeding.

While the plaintiff was preparing to lock into his cell defendant **CAPTIAN GANIES** stated to him that she was tired of his shit and that she was well informed that he had sued the department of correction and the **CITY** but that she didn't give a fuck about a law suit because it wasn't her money that will be given out. **See EX-K and EX-L.**

Defendant **CAPATIAN GAINES** then went on to state that she was going to stop the plaintiff from contacting his attorneys who are representing him because if she stops that then she will stop the suits and that as the security captain she was going to ensure that his (1) hour mandatory daily recreation was cut as well, which the plaintiff filed a grievance memorizing see **EX-D**. As mental health referral was also generated from this, enter action which lead to the plaintiff being placed on Suicide watch. **See EX-M.**

On October 2<sup>nd</sup> 2022 the plaintiff was not afforded (1) hour recreation as stated by defendant **CAPTAIN GANIES**.

On October 3<sup>rd</sup> 2022 from 7:00am – 10:30am the plaintiff suicide watch was not present which he took as a way of following through on the threat from defendant **CAPTIAN GANIES**.

On October 3<sup>rd</sup> 2022 at 5:15pm the facility clinic contacted housing unit 2a and order that the plaintiff be produced and as soon as the officer requested Clarence over the facility wide walkie talkie to escort the plaintiff to the clinic defendant **DEPUTY WARDEN FLEMMING** called the housing unit and ordered the production to be stopped without reason.

At approximately 6:00pm the plaintiff was being escorted by officers and as soon as the plaintiff and officer walked outside of the housing unit deputy wardens Phillips and defendant **DEPUTY WARDEN FLEMMING**, stopped the plaintiff and officer and stated **DEPUTY WARDEN FLEMMING** stated *"I DON'T CARE WHAT HIS MEDICAL SITUATION IS YOU*

*DO NOT MOVE A BODY AFTER I GAVE AN ORDER NOT TO*". It was clear to the plaintiff at that time that for whatever reason **DEPUTY WARDEN FLEMMING** order was adverse to his medical needs.

On October 4<sup>th</sup> 2022 the plaintiff requested medical and sick call due to stomach pain explaining that he didn't feel well in the area where he just had surgery at sick-call and medical was not provided and the plaintiff suffered with a constant pain at the level of being a on the scale from 1 – 10.

On October 4<sup>th</sup> 2022 defendant **PRESTON RITTER** walked into the housing unit 2a while the plaintiff was in cell (7) which is housing unit cell dedicated to legal studies, and stated to the plaintiff *"YOY ARE GOING TO DIE IN MY JAIL UNLESS YOU DROP YOU LAWSUIT"*. **(PLEASE PERSEVE THE HOUSING UNIT VIDEO APPROXAMATELY 11:00AM WHEN ADW HENRY SIGNED HOUSING UNIT LOGBOOK, IN CASE FOOTAGE IS ERASED BY TIME DISCOVERY PROCESS COMMENCE IN THIS ACTION).**

On October 4<sup>th</sup> 2022 at approximately 2:00pm defendant **PRESTON RITTER** gain was present in the housing unit while defendant was being afforded a shower. The facility Warden was present as well and when defendant **PRESTON RITTER** over heard the plaintiff voicing his grievances to the warden defendant **PRESTON RITTER** became aggressive and upset and began threatening the plaintiff and ordering him to shut up and go to the shower. **(PLEASE PRESEVRE THE VIDEO FOOTAGE FROM HOUSING UNIT 2A ON THIS DATE AND TIME SO THAT THE FOOTAGE WILL NOT BE ERASED OR MISSING BEFORE COMMENCEMENT OF DISCOVERY IN THIS ACTION)**

From August 29<sup>th</sup> 2022 – October 8<sup>th</sup> 2022 until on October 8<sup>th</sup> 2022 he was allowed to clean his cell, the plaintiff informed housing unit staff that his toilet was stopped up and that feces was floating in the toilet and that he need the plumber to be called.

The plaintiff was allowed to use the bathroom in another cell but he was never allowed to clean his cell toilet or be moved to another cell, which he was told could only be done by defendant **CAPTAIN GANIES** because of her ranking of security captain at the facility.

These leads to the plaintiff having to sleep eat and remain in a cell 23 hours a day with these feces.

On October 5<sup>th</sup> 2022 there was a mental health referral was generating by DOC Staff informing mental health personnel that the plaintiff conduct and behavior was being affected by the fact that he was unable to clean his cell and had to live with the feces inside of it, and that he seemed to be becoming suicidal.

On October 5<sup>th</sup> 2022 the plaintiff requested medical and sick call due to stomach pain explaining that he didn't feel well in the area where he just had surgery at sick-call and medical was not provided and the plaintiff suffered with a constant pain at the level of being a on the scale from 1 – 10.

On October 5<sup>th</sup> 2022 defendant **CAPTAIN GANIES** was present on housing unit 2b but made it her business to stop at housing unit 2a and informed housing unit staff that the plaintiff was not to be moved out of his shitty cell unless he agreed to unpublished his book, speaking in regards to the book titled "THE TRUE UNTOLD STORY OF THE NOTORIOUS RIKERS ISLAND".

On October 5<sup>th</sup> 2022 at approximately 6:30pm defendant security **CO GRAVES** came to afford legal phone calls to court ordered inmates attorney and informed the plaintiff that he would not be able to call his attorney unless he agreed to drop his lawsuit against him. Defendant **CO GRAVES** was speaking in reference to the matter of **ALEXANDER WILLIAMS JR V. CITY OF NEW YORK ET AL.** 21-CV-01083, where defendant **CO GRAVES** is named as a defendant in regards to the plaintiff medical needs.

The plaintiff was deprived from calling his attorney for from September 30<sup>th</sup> 2022 - \_\_\_\_\_, \_\_\_\_\_, 2022 and was only being afforded when CO Willie McNeil or CO Harris conducted the legal calls for court ordered lock down inmates.

On October 6<sup>th</sup> 2022 the plaintiff requested medical and sick call due to stomach pain explaining that he didn't feel well in the area where he just had surgery at sick-call and medical was not provided and the plaintiff suffered with a constant pain at the level of being a on the scale from 1 – 10.

On October 6<sup>th</sup> 2022, the plaintiff was scheduled for a medical trip to Bellevue Hospital for a checkup due to his surgery after complaining of stomach pain daily which was abnormal. The defendants **CITY** failed to produce the plaintiff to medical appointment which denied the plaintiff adequate medical care after a surgery and also seems to be a custom, practice, usage, procedure or rule not to produce inmate to medical appointments inside and outside of the facility. The plaintiff cannot inform the Court on exactly how many date the plaintiff was not produced to hospital by defendant **CITY** by way of DOC Officials so the plaintiff ask that the Court review the plaintiff DOC Medical records to include any all medical appointments that he was not produce to, to add to this claim.



On October 6<sup>th</sup> 2002 at approximately 2:30pm Defendant **CO GRAVES**, conducted legal calls and once dialed the number to Julie A. Clark Esq., 917-309-9862, stood in front of the plaintiff door and listened to the plaintiff calls with his attorney until he was done. This violated the plaintiff Sixth Amendment Right to communicate with his attorney in private. **(PLAINTIFF ASK THAT THE FOOTAGE FROM THIS DATE AND TIME BE PRESERVED SO THAT IT WILL NOT BE ERASED DESTROYED OR UNAVIABLE ONCE DISCPVERY IN THIS MATTER IS COMMENCED)**

On October 7<sup>th</sup> 2022 the plaintiff requested medical and sick call due to stomach pain explaining that he didn't feel well in the area where he just had surgery at sick-call and medical was not provided and the plaintiff suffered with a constant pain at the level of being a on the scale from 1 – 10.

On October 7<sup>th</sup> 2022 at\* 12:15pm defendant Andre Hickson conducted legal phone calls for the Court Ordered Lock Down inmate of housing unit 2a. Defendant Andre Hickson walked to the plaintiff cell with the phone in his hand and once he was in front of plaintiff cell checked to make sure that his boy worn camera was off and stated *" I DYOU WRITE ON A GRIEVANCE BEON'T CARE WHAT YOU WRITE ON YOUR GRIEVANCES BECAUSE GANIES IS BACKING ME (SPEAKING IN REFERENCE OF DEFENDANT CAPTAIN GANIES) YOU ARE NOT TO CALL YOU LAWYERS UNTIL YOU DROP YOU LAWSUIT AGAINST ME AND UNPUBLSH YOUR BOOK, SPEAKING IN REGARDS TO THE BOOK TITLED "THE TRUE UNTOLD STORY OF NEW YORK CITYS' NOTORIOUS RIKERS ISLAND".*

Due to this the plaintiff was unable to contact s to his attorney's in regards legal matters which caused him to be depressed, stressed out and have an anxiety attack.

It is also important to note that the facility maintains a policy that is seen herein EX- E, that clearly states that GRVC staff is to record on their body worn cameras "ANY/ALL" services that are provided to the plaintiff and log such on a separate excel grind sheet along with storing footage, stating the plaintiff by name and book and case number.

On October 8<sup>th</sup> 2022 the plaintiff requested medical and sick call due to stomach pain explaining that he didn't feel well in the area where he just had surgery at sick-call and medical was not provided and the plaintiff suffered with a constant pain at the level of being a on the scale from 1 – 10.

On October 9<sup>th</sup> 2022 the plaintiff requested medical and sick call due to stomach pain explaining that he didn't feel well in the area where he just had surgery at sick-call and medical was not provided and the plaintiff suffered with a constant pain at the level of being a on the scale from 1 – 10.

On October 10<sup>th</sup> 2022 the plaintiff requested medical and sick call due to stomach pain explaining that he didn't feel well in the area where he just had surgery at sick-call and medical was not provided and the plaintiff suffered with a constant pain at the level of being a on the scale from 1 – 10.

On October 08, 2022 the plaintiff requested a medical emergency from Captain Jones who contacted the facility clinic area explaining that the plaintiff was in need of medical care from serve pain in his stomach and had just had surgggy . This took place at approx 1:15pm the plaintiff was forced to sit and wait while in pain until 5:00pm that night.

This is a matter that has already been addressed in the matter of AGNEW V. N.Y.C. DEPARTMENT OF CORRECTION 2021 N.Y.Misc. LEXIS 6134. Where Judge Elizabeth A. Taylor ordered DOC and defendnat City to get in compliance with its mandatory duties under New York City Administrative Code § 9-108(c), Correction Law § 500-c(4), and the Rules Of The City Of Ne York 40 §§ 3-02(b)(4),(c)(1), (c)(2)(1) and (c)(4).

On October 9th 2022 at approximately 2:00pm Inmate Kwaine Thompson was sprayed in the housing unit area with MK-9 which lead to the entire unit whihc is only 16 cells being filled with the chemical agent. The plaintiff began to suffer from a asmatha attack due to beuing allergiuc t peppers which is listed in his medical records..

The plaintiff was never afforded the medical care that he requested and as a result was forced to use sink water and a wash clothes as a make shift filtration system.

On October 9th 2022 the plaintiff was not allowed the opportunity to call his attorney as the Court Order Polcicy states and is under the believth taht he was not allowed to do so because he was told this by Defendnat KEVIN YOUNG on October 8th 2022 that he would not be allowed to call his attorney as long as he had an issue with security satff standing in front of his dorr whenever he spoke with his attorney.

On October 10,2022 at approximately 9:25AM Defendnat Capatin Ganies toured the plaintiff housing unit of 2a. When she passed the plaintiff door she hesitated as if the plaintiff and her was speaking and stated that "I SEE SECUIRTY HASNT BEEN HERE TO AFFORD YOUI LEGAL CALLS", "THAT IS MY TEAM AND THOSE ARE MY

ORDERS". "YOU WILL BE AFFORDED LEGAL CALLS WHEN YOU DECIDE TO UNPUBLISH YOUR BOOK" (SPEAKING IN REGARDS TO THE PLAINTIFF BOOK TITLED: THE TRUE UNTOLD STORY OF NEW YORK CITY NOTORIOUS RIKERS ISLAND)

The plaintiff explained that he would not be using the phone because he had ni plans of unpublishing his book. Defendnat CAPTAIN GANIES response was that "NIGGA I WILL GET YOU KILLED RIHGT HERE IN THE JAIL" "I will have people pull up to your cell and trust me i havew done this before".

From the researched the plaintiff did before he published his book he discovered that the defendant CAPATAIN GAINES did assult another female captain by the name of Captain West while being employted as a Captain at the GRVC facility which allowed the plaintiff to belive that their was credance to the defendant CAPATIN GABNIES threat as she had already shown that she has a perpensity for committing acts of violence.

The plaintiff then oper heard the defendnat CAPTAIN GANIES turn to Corrections officer Kenol and Correction Officer Graham amd state that she wanted to to write a report stating that they had heard the plaintiff threaten her because she knew how to get him to drop his book out of circulation with her name in it and that she planned to attempt to press charges against the plaintiff for something or some sort of matter. (PLEASE PERSEVE THE GENTIC CAMERA FOOTAGE AND BODY CAMERA FOOTAGE FROM CAPATIN GANIES AND BOTH CO KENOL AND GRAHAM TO ENSURE THAT THE EVIDENCE IS NOT ERASED OR UNAVAILBE BEFORE DISCOVERY STAGES COMMENCE IN THIS MATTER)

EX- I is A statment from an inamte by the name of Kwaine Thompson who was a witness to this ordel.

During this ordel the defendnat CAPATIN GANIES stated that she wish that the plaintiff would just die and that she had already attempted to help him die by taking her time getting him out of the facility on the day that he was schedlued for surgey.

Defendnat CAPATIN GANIES is directly reffering to September 20, 2022 when the plaintiff was in a medicla emergency due to GallBladder and not being produced to Bellvue hosipital for the 5th or 6th time form medical. EX-J is the plaintiff's CMC information shett that clearly states that the plaintiff is to be transported by tranportation department only, but on the date and question defendnat CAPATIN GANIES and other ~~DOJ~~ DOC Officials purposely failed to implæment their own transportation policy as it relates to the plaintiff as an act of retalaition which as a result resulted his constitutional rights.

Also during this same ordel defendant CAPTAIN GANIES STATED to the ptaintiff that he was not going to be allowed a shower, was not going to be allowed to contact his attorney nor was he going to be allowed his (1) recreation by her orders as security captain at the facility. see EX-23.

As a result of this on October 10, 2022 the plaintiff was not afforded a shower when he requested as an act of retaliation from defendnat CAPATAIN GAINES, as a result the plaintiff was not allowed to call his attorneys as am act of retailiation from defendnat CAPATIN GAINES and as a result the plaintiff was ubject to 24 hour locked in a cell without recreation when he requested as an act of retalaition from defendnat CAPATIN GAINES.

On October 10, 2022 at approximately 11:30am defendnat CAPATIN GAINES toured again and as she passed the plaintiff cell stated I want to see how those new charges fit your ass, because I know what your case is and I know that you have been locked up 5 years (INFORMING THE PLAINTIFF THAT SHE HAD TO HAVE WENT AND RESEARCHED HIM AND CONTEMPLATED AN ATTACK OR ACT THAT WOULD ADVERSE TO HIS CRIMINAL CASE) and I know that once I file a police report stating that you threaten me as a Peace Officer that it will fuck your entire case up.

On October 11, 2022 the plaintiff was not afforded recreation as an act of retaliation from defendnat CAPATIN GAINES, WHEN HE REQUESTED IT.

On October 11th 2022 at approximately 10:15am - 11:15am Defendnat KEVIN WHITE was affording the plaintiff his legal call as per court order lock down policy when as he was dialing the plaintiff's lawyer Julie A. Clark Esq, the phone line went dead and defendnat CAPTAIN GAINES came over the air via the walkie talkie and stated that "THAT INMATE IS NOT ALLOWED TO CALL HIS ATTORNEY". Kevin White was lost and not in agreement with the action of defendnat CAPATIN GAINES but could not afford the call because of the line was cut from DOC administration office, which was outside of the housing unit and out of his power.

On Saturday October 8th 2022 the defendnat Kevin Young conducted legal calls on housing unit 2a and stated to the plaintiff that he would not be allowed to call his attorney because he was changing his pin number which was 718-718 to an unknown pin.



As a result on the plaintiff was not able to call his lawyer on ~~Sundaxxxx~~ Sunday October 9th 2022.

On October 12, 2022 when legal calls was being afforded by defendnat Andre Hickson He was unable to service the plaintiff call because the pin that defendant KEVIN YOUNG changed it to from 718-718 to 884-884, was no longer the same and there was no update.

There was also no documentation as to why the plaintiff pin had been changed 3x's in (1) week. This in itslef is clear and supportive evidence that DOC Officlas are and engaging in a campaignn related to retlaiting against the plaintiff for whatever reason.

On October 12, 2022 at approximately 11:30am a ESU Unit rushed the pplaintiff housing unit while he was in Cell 7 whihc is dedicated to Law Library studies. The plaintiff was legally in possession of a DOC issued Tablet and an USB with his discovery that was sent to the New York Citry legal Division by his attorney and had already been examined and apporved for his possession.

~~Onhs~~ ~~XX~~ESU UNI conducted a search of the plaintiff and his cell whihc is cell 11, and ended up taking from the plaintiff two pair of Puma sneakers whihc were approved by DOC official and a sweater whihc was DOC issued and a pair of grey sweat pants whihc also was never given a reason why these items where taken nor given a reciept for entire items or USB with Discovery on it. See EX-22

The plaintiff understood this as being from defendnat captain ganies who made this types of threats on a prior date stating that she would have nigga pull up to the plaintiff cell.

This is also support of the defendant's CITY failing to train ESU members in informing them that Court Order Classified Inmate are allowed USB via discovery by way of the facility law library. This is crucial because it seems as in ALEXANDER WILLIAMS JR V CITY OF NEW YORK ET AL, 21-CV-1083 (PGG) (KHP) AND ALEXANDER WILLIAMS JR V. CITY OF NEW YORK ET AL., 22-CV-3819 (PGG) (KHP)

that the defendant CITY by way of DOC Officials have applied a restriction of limiting the plaintiff law library access which is a restriction not listed on the Supreme Court Lockdown Order and ADA Ernest Chin has explained that such limitations and restriction are not in accordance with the lockdown order to DOC officials.

It is also support that defendant CITY by way of the defendant listed and named herein this complaint failed to train and supervise these defendant and ensuring that that possess the mental capacity of not being emotional and / or not using DOC policies, customs, usages to retaliate against the plaintiff or any other inmate detained with city facilities.

The failure in this training is the exact reason and cause of the rise and uptick in death amongst detainee on Rikers Island that the World has been seeing and witnessing first hand.

On October 12, 2022 the plaintiff was not allowed to call his attorney as an act of retaliation nor was he afforded his (1) hour of recreation which as a result led to him being confined in a cell for 24 hours a day for the fourth day in a row.

This is not what the plaintiff Supreme court Order stated and the defendant including CITY, has failed to give the plaintiff and notification as to why these are factors that are occurring whenever he grieves and demand a written response.

ON October 12, 2022 when ESU team member escorted the plaintiff from cell 7 to cell 11 to conduct a search they did so even though the plaintiff informed the officers that he was not supposed to be rear cuffed and had medical records stating such.

The department of corrections as well as Bellevue Hospital gave medical permits informing that the plaintiff is to be front cuff only due to surgery and rear cuff creating complications. See EX-2

Later that day on October 12, 2022 the plaintiff began feeling a sharp pain in his abdominal area and notice blood coming out of his rectum area when he used the bathroom. He informed housing unit staff of this who informed him that medical stated that they were busy and would call him down later. See EX-24.

On October 12, 2022 at approximately 6:40pm defendant ANDRE HICKSON, stated to the plaintiff that he was told by defendant CAPTAIN GANIES not to allow the plaintiff to call his attorney but that he would order the plaintiff commissary that must be ordered by phone.

On October 13, 2022 the plaintiff asked for a shower and was denied the right to do so stating that the defendant CAPTAIN GAINES gave an order that he was not allowed to take a shower until he unpublished a book.

Also on that same date of October 13, 2022 the plaintiff was not afforded his (1) Hour recreation in pursuant to his Supreme Court Lockdown Order or sick-call stating that the defendant CAPTAIN GANIES left word that he was not allowed either of these services.

The plaintiff informed housing unit staff that he was in severe pain and was vomiting and bleeding out of his rectum and needed medical services bad. he was not afforded these services

and belived that the denial of these services was tied to the order from defendant CAPTAIN GANIES , like every other services was denied by her order.

On October 13, 2022 the plaintiff was again shceduled to be taken to Bellevue Hospital for Post-opt srugey check up by the plaintiff was not produced by "DOC OFFICIALS" with a reason unknown butr belived that again the defendantx CAPATIN GAINES had interuupted his medical trôp as he had seen so in the past.

Also onOctober 13, 2022 the plaintiff became aware that both sets of his sneakers were no longer in his cell after the ESU search the day before and rember seeing these officers walk out of his cell with a bag.

"The plaintiff ask that the footage and body camera footage from this seach be perserved so that it is available by the time the discovery process for this matter commence."

Again on October 14, 2022 the plaintiff alerted medical staff and housing unit staff that he was bleeding from his rectum and vomiting twice or three times a day and needed to be examine because of sharp apin in his area where he had recently had surgey at.

AGain the plaintiff medical emergency matter s was ignored under the pretense that he would be allowed medical attention if he discontinued selling a book where the defendant CAPATIN GANIES was named inside of it from a negative point of view.

The plaintiff wanted to contact his attorneys' and ask them for help from the outside and again on October 14, 2022 the plaintiff was not afforded sick-call, (1) hour recreation of legal calls to prevent him from informing his attorney's of the conduct that the defendant's were engaging in.

On October 14, 2022 at approximately 5:50 pm defendant PRESTON RITTER AND ANDRE HICKSON, was present on housing unit that the plaintiff was detained in and explained that they would allow the plaintiff to order commissary via phone but was ordered by their captain in defendant CAPTAIN GAINES not allow the plaintiff to contact anyone that was on his allowed call list until he played ball with them. On that date and time defendant ANDRE HICKSON Specifically asked the plaintiff " WHAT DO YOU WANT TO TALK TO YOUR LAWYERS ABOUT SO BAD".

On October 15, 2022 at approximately 7:15 am the plaintiff spoke directly to the doctor who was present during sick-call rounds and explained that he was bleeding , vomiting and had severe pain in his stomach to which the doctor stated that I would see what I can do for you and left the housing unit. as a result the plaintiff was never seen by medical staff that day nor was he given a reason why. (THE PLAINTIFF ASK THAT THE GENTIC FOOTAGE FROM THE HOUSING UNIT ON THIS DATE AND TIME BE PRESERVED SO THAT IT WAS NOT BE DELETED BY THE TIME THAT DISCOVERY STAGE COMMENCE IN THIS MATTER).

On October 15, 2022 at approximately 2:15pm defendant ANDRE HICKSON was present on the housing unit conducting legal calls. This defendant came to the plaintiff who was in cell 7 at this time and stated that you "YOU ALREADY KNOW YOU ARE NOT GETTING ANY CALLS UNTIL YOU CHILL WITH THAT BOOK RIGHT" and walked off. (THE PLAINTIFF ASK THAT THE GENTIC FOOTAGE FROM THIS DATE AND TIME BE PRESERVED FOR DISCOVERY PURPOSES ).

On October 15, 2022 for the 6th times that week of the month the plaintiff fwas not afforded his (1) recreation pursuant to his Suprme Court Lockdonw order. This as a result was the p̄aintiff being subjected to 144 hours straight locked in a cell without access to sun, fresh air or ability to excercise and was done in a punitive fashion or in regards to retaliation for his lawsuits and publishing of a book that exposed certain correctional officers and some of which are defendnat herein this complaint. DEFENDNAT ANDRE HICKSON, DEFENDNAT PRESTON RITTER AND DEFENDANT CAPATIN GAINES.

These type of condiction are inhumane and are in violation of the plaintiff Constitutional rights.

It is clear that the defendants as well as defendnat CITY by way ofd Department of Correction officials are deliberate and indiffrent to the objective condicions surreounding the mandated (1) hour reareation the the plaintiff is suppose to have whihc is in accordance with the supreme court lockdown order.

On October 15th 2022 at approxmately 6:00pm the defendant ANDRE HIOCKSON was present on the plaintiff hosuing unit conducting legal calls.

When defendant ANDRE HICKSON, appraoched the plaintiff he asked the plaintiff was willing to play ball yet and that is so he would allow the plaintiff to call his attorney as long as the plaintiff diodnt complain about him listening to the call.

The plaintiff was kneel over and begged the defendnat ANDRE HICKSON, to please alert the clinic that he was having a medical emergency , by bleeding from his rectum area and vomiting attached to cold and hot flashed.



The defendnat ANDRE HICKSON, informed the plaintiff that the didnt give a flying fuck about his health and would not alert a soul about how he was feeling and that the plaintiff should of thought about such before he sued him. The defendnat ANDRE HICKSON was speaking in regards to the ongoing matter in this Circuit of ALEXANDER WILLIAMS JR VS . CITY OF NEW YORK ET AL, 21MCV-1083 (PGG) (KHP).

The sdame defendnat was also found to be liable for simular tactic in retalaition against the plaintiff and another court order lockdown inmate in the matter of WJOHMANNI ANDUZE V. CITY OOF NEW YORK ET AL., 21-CV-0519 AUGUST 08, 2022 (REPOPRTER) 2022 U.S. Dist 140929.

It is imoportant to note that the defendants CITY by way of New york City Department of Correction maintain a polciy that states: 3-02(B)(4) "CORRECTIONAL PERSONNEL SHALL NEVER PROHIBIT, DELAY, OR CUASE TO PROHIBIT OR DELAY AN INMATES ACCESS TO CARE OR APPROPRIATE TREATMENT. ALL DECISIONS REGARDING NEEDS FOR MEDICAL ATTENTION SHALL BE MADE BY HEALTH CARE PERSONNEL".

Defendants' ANDRE HICKSON denail to the plaintiff for medical care was violation of his rights and was tied directly to retaliation against the plaintiff ffor Fisst Amendment in filing a lawsuit and petitioning the governement.

Defendnat CITY is also liable for this denail in that defendnat CITY is and was properly informed of the retalaition tactics and methods that the plaintiff waa recieving from the defendnat as they were already hight lighted in not one but two prior suits before the filing of thei comapint in matters of ALEXANDER WILLIAMS

VS. CITY OF NEW YORK ET AL., 21-CV-1083 (PGG)(KHP) & JOHMANNI  
ANDUZE VS . CITY OF NEW YORK ET AL., 21-CV-0519 )AUGUST 08,  
 2022 (REPORTER 2022 U.S. Dist 140929) and that defendnat CITY  
 failed to prevent further retalaition against the plaintiff.

Defendant ANDRE HICKSON was aware that the plaintiff had recently had a stomach surgey and removal of an organ so being informed of the pain and condiction that the plaintiff explained and denying such medical care in negligent and malice in a deliberate and indiffreecne fashion.

On October 16, 2022 at approaximately 5:00pm defendant CO GRAVES was present on the plaintiff housing unit to conduct legal calls and when the plaintiff was attempting to call his attorneyu to report what he was going through the defendnat CO GRAVES stood directly in front of the plaintiff door as to listen to the plaintiff conversation with his ~~xxxxxx~~ attorney which is protected under the Sixth Amendment of teh Const and a matter that the defendnat CITY was given notyce violated the plaintiff rights before hand in the matter of ALEXANDER WILLIAMS JR V. CITY OF NEW YORK ET AL., 21-CV-10873 (PGG) (KHP) REPORT AND RECCOMENDATION DATED AUGUST 05, 2022. ( THE PLAINTIFF ASK THE THE GENTIC VIDEO FOOTAGE FROM HOUSING UNIT 2A BE PERSERVED FROM THIS DATE AND TIME SHOWING THAT DEFENDNAT GRAVES WHILE CONDUCTING THE PLAINTIFF LEGAL CALLL TO ~~XXXXXX~~516-316-2841 DID STAND IN FRONT OF CELL 7 WHILE PLAINTRIFF ENEGAGED IN PROTECTED CONVERSATION).

On October 17, 2022 the plaintiff was not afforded to opprotunity to call hisx defense attorney's even though he was sbceduled for an improtnat hearing the next day on October 18, 2022 that could determine the course of his criminal case.

This denial was during the 7-3 tour which are normal business hours where a lawyer could be contacted.

During the 3-11 tour at approximately 7:00pm Defendant CO GRAVES came to the plaintiff's housing unit to conduct calls and the plaintiff had the opportunity to speak with this defendant in regards to the violation of denying legal calls and the violation of the lack of privacy that the plaintiff was being afforded as it related to legal calls with his defense team.

During this conversation in the housing unit dayroom defendant CO GRAVES informed the plaintiff that security team officer was instructed by defendant CAPTAIN GANIES not to allow the plaintiff to contact with his defense team or allowed call list because of the fact that the plaintiff had written about her in his book.

Defendant CO GRAVES also stated that he was instructed by his captain who is defendant CAPTAIN GANIES that pursuant to DOC policy 4007 R-B that anyone from security could legally listen and also take notes in regards to what the plaintiff was talking about on the phone regardless of who the plaintiff was speaking with whether it was a lawyer or a private investigator.

This statement is tying the defendant's actions to Custom, Practices, Usages, Procedures and rules that violates the plaintiff's Constitutional rights to privacy with his attorney under the Sixth Amendment of the United States Const.

As a result the plaintiff was unable to work on the presentation with his defense team that they were preparing for their meeting with the Kings County Homicide Borough Chief in efforts to getting the Plaintiff Criminal Charges dismissed.

It is also obvious that the Custom Usage, Policy, Practice, Rule And /or Procedure that is being enforced against the plaintiff

in reference to this matter of communication with his allowed attorney's is being enforced to obtain just that desired adverse affect against the plaintiff.

On October 17, during the conversation with defendnat CO GRAVES at approaxmenetly 6:45pm -7:30pm on hoisung unit 2a in dayroom. (THE PLAINTIFF RESPECTFULLT DEMAND THAT THE VIDEO FOOTAGE FROM THIS DATE AND TIME BE PERSVED SO THAT THE GENTIC VIDEO CAN BE PRESENT DURING THE STAGES OF DISCOVERY IN THSI MATTER).

ON OCTOBER 17, 2022 AT APPROX 12:15PM THE PLAINTIFF WAS ALLOWED TO USE CELL 7 ON HOUSING UNIT 2A WHIHC IS DEDICATED FOR LAW LIBRARI STUDIES FOR COURT ORDER CLASSIFICATIOPN OF INMATES. The footage form this date and time until 2:30pm will show that the plaintiff is subjected to having to use a plastic bag to urinate or deficate into while in cell 7 because of the feat tha there is no toilet in this cell and housing unit staff in instructed by defendant CAPTIN GINES not to open cell doors unless she or another caoptin is present.

This is ~~isxxxx~~ something that is impossible because of the fact that the facility GRVC is short of staff whihc include Captins whihc affects the enforcemenet of this Rule, Practcie Polciy without being Cruel and Unusla or Abritry and Caprious in nature.

The pplaintiff ask that THE GENTIC FOOTAGE FROM THIS DATE AND TIMES MENTIONED IN REGARDS TO THIS CLAIM BE PERSVED FOR DISCOVERY PURPOSES 10/17/2022 12:30PM - 2:30PM DIRECTLY CELL 7 AREA OF HOUSING UNIT 2A.

Oc October 18, 2022 the plaintiff was produced to the Seg Intake section of the facility for Court Prodcution.

While waiting in the section of the Building (1) in front of the Seg Intake door defendant CAPATIN GANIES appeared in the Facility Corridor section in front of Building one approximately 7:30am and stated to the plaintiff the following, "I SENT ESU TO YOU AND THEY STRIPPED YOU OF YOUR LEGAL WORK AND SNEAKERS BECAUSE OF THE FACT THAT YOU ARE BEEFING WITH ME AND "MATHIS", I SEE THAT YOUR LAWSUITS STILL HAVENT BEEN DROPPED SO DO NOT BE SURPRISED IF YOUR COURT CLOTHES AREN'T'S ALL THERE".

The statement from defendant CAPATIN GANIES is a direct statement that informed the plaintiff that he was subject of her retaliation on October 12, 2022 when ESU took his property and legal studies in the form of USB and DOC issued tablet. It also supports that defendant CAPTIAN GANIES conduct is a direct and proximate result of the plaintiff suffering from a campaign of retaliation that she is spearheading due to his grievances against her, his book in which she is named in titled "THE TRUE UNTOLD STORY OF NEW YORK CITY'S NOTORIOUS RIKERS ~~XXXXXX~~ ISLAND", AND an ongoing Civil matter in which he is approaching trial in the matter of ALEXANDER WILLIAMS JR, VS. CITY OF NEW YORK ET AL, 19-CV-3347 (JLJ), where in this matter it has already been shown that many Correctional Personnel has been retaliating against the plaintiff in regards to. (THE PLAINTIFF DEMAND THAT THE FOOTAGE FROM THE FACILITY CORRIDOR FROM OCT 18, 2022 MORNING OF 7:10AM - 8:00AM BE PRESERVED FOR DISCOVERY PURPOSES).

On October 18, 2022 when the plaintiff was getting dressed for Court he became aware that his black Gucci shoes was missing from his Court Clothes bag and understood then what defendant CAPTIN GAINES HAD stated to him minutes earlier. The plaintiff filed a grievance as a result to memorialize the incident. See EX-16.

PLEASE NOTE: THAT THE AREA IN SEG INTAKE WHERE COURT ORDER INMATE TRIAL CLOTHES ARE STORED IS CONSTANTLY UNDER CORRECTIONAL STAFF OBSERVATION AND HAS NO INMATE WORKERS PRESENT EVER.

On October 19, 2022 during the times of 12:30pm and 1:15pm defendants CO PRESTON RITTER, KEVIN WHITE AND ANDRE HICKSON WAS present on the plaintiff housing unit conducting legal calls. At some time during their being present the defendant PRESTON RITTER walked over to cell 7 where the plaintiff was using for legal; studies and preparation of this complaint and began speaking to the plaintiff in efforts to convince him to drop his lawsuit against MATHIS who was once his captain at the facility and to discontinue his grievance and that he would ensure that the plaintiff be allowed to contact his attorney and that all retaliation would cease. THE PLAINTIFF ASK THAT THE FOOTAGE FROM CELL 7 ON OCT 19, 2022 FROM 12:30PM - 1:15PM BE PRESERVED FOR DISCOVERY PURPOSES.

On October 20, 2022 at approximately 11:00am - 12:15pm the plaintiff was forced to urinate and defecate inside of a DOC issued plastic bag while he was in Cell 7 being afforded Law Library on housing unit 2a. (THIS IS A CUSTOM, POLICY, PRACTICE, USAGE, RULE AND PROCEDURE) because of the fact that cell 7 does not have a Toilet inside of it and as per CLO 13/21 seen in EXA-A herein officers are told not to open any cell doors unless a captain is present. See Pg 2 of Ex-A.

PLEASE NOTE: THAT THE PLAINTIFF REQUEST THAT THIS CLAIM BE ADDED TO WHATEVER ~~WHATEVER~~  
THE COURT DEEMS THE VIOLATION IS AS WELL AS BEING ADDED AGAINST THE DEFENDANT  
CITY FOR THE SIXTH, EIGHTH, THIRD FOURTH AND FIFTH CAUSES OF ACTION STATED  
HEREIN THIS COMPLAINT.

(THE PLAINTIFF ALSO DEMAND THE THE HOUSING UNIT FOOTAGE BE PPERSEVED FROM THIS DATE ON OCTOBER 20TH 2022 AND TIME OF 11:00AM - 12:15PM SO THAT THE FOOTAGE WOULD BE AVAIBLE DURING THE TIME OF DISCOVERY IN THIS MATTER)

On October 20th 2022 again at approaxmatley 1:30pm - 2:15pm and 2:15pm 03:15pm the plaintiff was inside of cell 7 on housing unit 2a at the GRVC facility and was forced to urinate in the DOC plastic bag because the Coorectional officer that wsas on the post calimed to be a medical status of MMQ and could not open the housing cell door without a captin present and/.or another correctional offficer whihc the facility informed her was not aviable at the time.

On October 21,2022 the defendnat KEVIN YOUNG was present on the housing unit conducting legal call at approximately 6:30pm -7:00pm and stated to the plaintiff the following: FUCK BOY YOU ARE NOT GOING TO USE THIS PHONE AND I BET MY CHECK THAT YOUR ASS GETTING SHACKLED DOWN DURING YOU REC TIME TOO". This was a direct and proxmate therat that informed the plaintiff that defendant KEVIN YOUNG was aware that the retsraint being used against the plaintiff was being used unlawfully and in a from of retalaition.

As a result the plaintiff was denied the right to speak wit hhis attorney as well as was intentioally inflcited emotionally by the defendant's KEVEIN YOUNG conduct.

On October 20th 2022 evening the plaintiuff was finally able to speak with mental health clinicain PHILLUP WHITQAHAM in regards to the emotional affects that the treatments that he was endurring was taking on himfrom the defendnats KEVIN YOUNG,



CAPATIN GAINES, CO ANDRE HICKSON, CO PRESTON RITTER, CO GRAVESX AND CO KEVIN WHITE AND OTHERS. The plaintiff was able to express that he was at times thinking of harming himself in order to escape the furtherance of such retaliation.

On October 20, 2022 evening approximately 7:00pm - 7:30pm the defendant KEVIN YOUNG was present on the housing unit to conduct legal calls and denied the plaintiff the right to contact his legal team unless he was able to lawyers and take notice that this usage, practice, policy and/or custom is something that the defendant CITY was aware was being practiced as it related to Court Order lockdown inmates and is a known violation of Sixth Amendment right to communicate with Counsel in a secure and private manner. This practice, usage, custom and/or policy is also evidence that the defendant CITY failed to train and supervise the defendant who engaged in that practice of the proper and legal way to provide legal calls to court ordered lockdown inmates.

On October 21, 2022 the plaintiff was afforded his (1) hour recreation by Rec staff in accordance with EX-A policy in a manner of waist chains, shackles and leg irons.

On October 22, 2022 when the plaintiff was afforded his (1) hour recreation he was done so in accordance with EX-A policy that states that lockdown inmates must be shackled and waist chains and leg irons while inside of the cage for an hour Recreation.

On October 23, the plaintiff was afforded his (1) hour recreation in accordance with EX-A which again violates his rights and is Cruel and unusual Punishment without due process of the Law.

The usage, practice, policy of this practice was deemed to already violate the rights of Court Ordered Lockdown inmate by Magistrate Judge Katherine H. Parker in the matter of ALEXANDER WILLIAMS JR. V CITY OF NEW YORK ET AL., 21-CV-1083 (PGG) (KHP) R&R DATED AUGUST 5, 2022, MEANING THAT DEFENDANT CITY was and is aware that such a practice is wrong and unlawful and still failed to change supervisory or inform defendant that are employee of the New York City Department of Correction that such tactic and procedures are wrong and need to be changed immediately to ensure the rights of the plaintiff's ALEXANDER WILLIAMS JR, and other classified as being Court ordered Lockdown inmates with the New York City Department of Corrections.

On October 23, 2022 the plaintiff again was forced to urinate and defecate inside of a DOC issued bag because there was no captain present or assigned to the housing unit on that date which made it difficult for the plaintiff to be moved back and forth from cell 7 during the times that he used it to cell 11 where he is assigned to use the bathroom ~~xxxxxxxxxxxxxxxxxxxx~~ in a timely fashion. (PLEASE PRESERVE THE CCTV FOOTAGE ON THIS HOUSING UNIT FROM TIME OF 1:30 PM - 3:00 PM SO THAT IT MAY BE AVAILABLE DURING DISCOVERY TIME IN THIS MATTER)

On October 24 -28th 2022 was not afforded hour recreation in pursuant to with his Supreme Court Lockdown Order, the plaintiff took this denial as an act of retaliation from security staff some of who are named as defendants herein this complaint.

From October 24 - Oct 31 2022 the plaintiff was not afforded the right to take a shower and ask that the defendnat persve the following: (MADATED SERVIES LOGBOOK FOR THE HOUSING UNIT 2A SO THAT THE DOCUMENTS CAN BE PROERLY PERSVE FOR DISCOVERY IN THIS CASE).

On October 26, 2022 at approxametly 2:20am in the morning the plaintiff was awaken by ESU members. The ESU officer with the numbers #254 on his vest took the plaintiff's "TORA" after reading a copy of EX-Awhihc the plaintiff had in open and stated to the plaintiff UTHAT PER POLCIY FOR THIS HOUSING UNIT WHIHC IS CLO #13/21 YOU CAN NOT HAVE A TORA AND COULD ONLY HAVE THIS, " whihc is when he took a Blue Giddeon issues bible out of his black satchel on his leg and tossed it on the bed and left with the plaintiff's TORA placing it inside of the same blackl sachtel. The plaintiff filed a grievance to memeroalize this incident that can bee seen herein as EX-17.

This supports the fact that the Plociy of the Court Order housing Unit whihc is CLO 13/21 signed by the defendnat WARDEN OF FACILITY, DEPUTY WARDEN TIFFANY MORALES, DW JONNEL SHIVRAJ, DEPUTY WARDEN JOANNE MATOES AND DEPUTY WARDEN LISA BARNBY , along with the knowldge of defendnat CITY, is a Custom , Usgae, Polciy, Practice that is being enficend that favors one relinon over the next and is forcing the plaintiff hereing ALEXANDER WILLIAMS JR, to study and on be able to follwo the Christain Religion and not the religion that he is known to be whihc is Jewish.

After this incidnet the plaintiff stopped receiving his Jewish Kosha meal wich was in accordance with his religious diet. The housing unit log book will support this as it will display that the menu that was logged into the book never came with Kosha Diert for the plaintiff.

This exhibits that the defendnats stated herein knowingly and willingly forced the Christain Religion on the plaintiff over the Jewish relioh in whihc he practices and the fact that the facility including the Warden DEFENDNAT CORTZ whi the grievance was forwarded to failed to address the matter when the complaint came to her and the also failed to return the plaintiff 's "TORA" whihc is related to his Jewish Religion.

Futhermore this is a factor that the defendnats CITY was aware of violated the plaintiff rights fefering the court to the matter seen herein the judges Report and Recommendation in EX-11.

ON October 26, 2022 attorney's ~~representing~~ representing the plaintiff from the law offices of PAUL WEISS, RIFKIND, WHARTON & GARRISON attempte dto visits Inantes Kwaine Thompson and Trevor Forrest in regards to a matter of retaliation and interference in a Civil litigatiuon of WILLIAMS V. CITY OF NEW YORK ET AL, 19-CV-3347, for reason unknown the attorneys were unable to visit this inmates via video from members of the security team.

On Friday October 28, 2022 again attorney's from the same office attempte dto visit inmate Trevor Forrest who was a witness to the conduct of defendnat CAPTIAN GAINES retaliating against the plaintiff in the matter of WILLIMAS V. CITY OF NEW YORK ET AL 19-CV-3347 AND AT THE SAME TIME THAT THE VIDEO WAS SCHDULED FOR THE PLAINTIF FFROM HIS CELL DOOR WINDOW WITNESS DEFENDNAT CAPTYIN GAINES enter the 2 control bubble station and later learn that Inmate Trevor Forrest 349-290-2023 was not allowed to speak with these attorney's because of defendant captian GAINES. (THE PLAINTIFF ASK THAT THE FOOTAGE FROM GRVC 2 BUILDING HALLWAY GOING INTO CONTROL STATION BE PERSVE FOR THIS DATE DURING 11:00AM

- 12:00PM ON OCTOBER 28, 2022)(SO THAT IT WILL BE AVAIBLE DURING DISCOVERY STAGES OF THIS MATTER).

As it relates to this matter and the actions of retaliation for his federal litigation against DOC officials EX-18 will display that the attorneys that represent the plaintiff felt the need to request a judicial intervention and transfer of the plaintiff to ensure his safety and health from specifically defendant CAPTAIN GAINES, CO HICKSON AND ESU MEMBERS who are named herein this matter for the conduct that they engaged in.

EX-19 will show that the Judge the honorable District Judge LEWIS J. LIMAN felt the need from the evidence that he was shown to order the defendant CITY in that matter to answer the attorneys and the courts and lay out the measures that were being taken to ensure that the plaintiff is protected against retaliation, by way of an emergency in-person conference out of his concern. ~~8xxx~~

In EX-18 the court can see that the information which is listed as being confidential herein this matter that was shown to the attorney's was of such high and importance that attorney's from PAUL WEISS, RIFKIND, WHARTON AND GARRISON felt the need to address the court of Saturday October 22, 2022, which is abnormal and out of practice.

On October 27, 2022 at approximately 1:50pm defendant ANDRE HICKSON afforded the plaintiff a legal call but first spoke to the plaintiff legal defense lawyer Julie Clark Esq before allowing the plaintiff to speak to her. Defendant ANDRE HICKSON informed the plaintiff that he better not speak to Julie Clark in regards to what is going on with the treatment he is getting or he would not be afforded a call again.

After passing the plaintiff the phone receiving and first speaking to Julie Clark, defendant ANDRE HICKSON stood in listening distance to ensure that the plaintiff did as his was threatened to do by him.

The same repeated it self during the same date but at 1:55pm when defendnat ANDRE HICKSON called the plaintiff priavtre investigator ~~Kevin~~ Kevin Mickson ( No relation to defendant). (THE PLAINTIFF ASK THAT THE VIDEO FOOTAGE FROM THIS DATE AND TIME BE PERSVED FOR DISCOVERY PURPOSES)

This conduct was and is so concerning that the plaintiff fand his attorney's and defense doesnt want the plaintiff to discuss the matters of his case over the phone, whihc in return is affecting the fashion in whihc they marshal the defense for the plaintiff fwho is preparing for trial and Kings County new York for chrges of Murder in the Second Degree.

Furthermore after being informed by hgs attorney from PAUL WEISS AND WHARTON & GARRISON , Eric Abrams and Robert Ologhilin the plaintiff learned that defendants CAPTIN GANIES and others where filing false reports that the plaintiff fhad threaten them in their family. (NOTE: THAT THE PLAINTIFF WAS NEVER SERVED WITH ANY TICKETS/MISBEHAVIOR REPORTS OR ANYTING ELSE IN REGARDS TO THIS ALLEGED INCIDENTS)

what the plaintiff concluded for this information and from the conudect that the defendnats named herein where enagaging in collectively was that the defendats were durring everything in their power to affect the outcome of the plaintiff criminal case by limiting/restricting access to his defense team, therathening him in regards of what he could and could not speak to his defnse team about when he did speak to them and falsfiying city documents

by filing false complaints of the plaintiff threatening them as a form of retaliation and passive violation of his Constitutional Rights.

This was a matter that District Judge LEWIS J LIMAN found to be concerning and issued a warning to Law department Counsel representing defendants in the matter of WILLIAMS VS. CITY OF NEW YORK 19-CV-3347 that he was possibly considering holding Defendant MATHIS in that case in contempt, and in violation of federal laws if the evidence concluded that the retaliation against the plaintiff was being done in order to affect the current Civil Litigation.

On October 29, 2022 the plaintiff again was not afforded a Kosher meal in pursuant with his Jewish Religion nor was he explained to the reason why.

The plaintiff would like to display to the Court herein that defendant CO KEVIN YOUNG, PRESTON RITTER AND ANDRE HICKSON was all found to have violated the plaintiffs, inmate Johmanni Anduze and inmate Gabriel Flores Sixth Amendments rights as it related to matters of Communication by phone and by mail with their respective criminal defense attorneys.

This can be seen in reviewing of EX-11 AND EX-15 herein establishing that the defendant CITY failed in their training and supervision of these defendants and that these defendants have no care and lack the mindset of reasonable sound people working/employed by the defendant CITY in their official policy and capacities.

There is no reason or legal defense that one can offer for why on each occasion there exist a need to speak first with the defense attorney/private investigator etc before allowing



the plaintiff to engage in communication that is protected and deemed privileged by State and Federal law.

Once the number is verified there is no reason to constantly ~~reaff~~ verify the same number. This in itself is support that the conduct and actions of these defendants as it relates to Communication with the Courts and Attorneys were purposely committed with the intentions of inflicting and causing some sort of harm to the plaintiff ALEXANDER WILLIAMS JR.

On October 29, 2022 the plaintiff was forced to piss and defecate inside of a DOC issued plastic bag due to not being allowed to come out of law library cell & when he needed to use the bathroom. See Genetic Footage on this date at 1:30pm. (THE PLAINTIFF ASK THAT THE FOOTAGE FROM THIS DATE AND TIME BE PRESERVED FOR DISCOVERY PURPOSES)

On November 2, 2022 at approximately 2:20pm defendant CO RAHMAN 11383, ordered the plaintiff to be locked in cell 7 which is the law library cell on housing unit 2a without access to the bathroom.

As a result the plaintiff was forced to urinate and defecate in a DOC issue plastic bag which was the norm on housing unit 2a. Genetic Footage from housing unit 2a will show defendant CO RHAMAN 11383, bring plaintiff ALEXANDER WILLIAMS JR a plastic bag to use the bathroom inside of at approximately 3:55pm-4:05pm. (THE PLAINTIFF REQUEST FOOTAGE OF THIS TO BE PRESERVED FOR DISCOVERY REASONS) (PLAINTIFF EXITED CELL 7 AT 4:15PM ON THAT DATE ASK THAT FOOTAGE AT THAT TIME BE PRESERVED AS WELL)

It is the plaintiff's belief that defendant CO RAHMAN was enforcing the unlawfully lockdown solitary confinement like

living conditions because of the fact when the plaintiff informed defendant CO RAHMAN that New York State Hall prohibits him to being locked in a cell 23/1 defendant CO RAHMAN explained that he did not want to argue with the plaintiff and that he had to enforce the rules of the facility and follow the orders of his security captain referring to the defendant CAPTAIN GANIES.

ON OCT29, 2022 12:45pm defendant ANDREW HICKSON afforded phone calls to housing unit but plaintiff was not willing to accept calling his legal team out of concern that he would not be able to speak to his attorney in confidentiality as pursuant to state and federal laws.

On Oct 29, at approximately 6:45pm defendant CO KEVIN YOUNG came to housing unit to conduct phone calls but again the plaintiff was afraid that he would not be able to speak with his legal team in private and confidentiality as pursuant to state and federal laws.

On Oct 30, 2022 during 7-3 and 3-11 tours the plaintiff was having hot and cold flashes and informed the housing unit of such. Area Captain ~~xxx~~ Gaun was informed by the plaintiff at approx 5:45pm while in return Captain Gaun contact defendant Dr Duvern who informed captain Gaun that the plaintiff could not be seen by medical due to his court order lockdown classification and that the plaintiff's sickness could not be helped by DOC and that he was scheduled for post-opt with surgeon team at Bellevue Hospital on Nov 3, 2022.

As of the sickness from that day the plaintiff was never seen by medical staff and was forced to bare with eye pains and sickness of vomiting and defecating blood for the rest of that day.

The plaintiff was scheduled on Nov 3rd 2022 to return to Bellevue hospital after the defendants CITY by way of DOC failed to produce him three times since the surgery on September 22, 2022. For Reason never told to the plaintiff he was not produced to this Post-Op Hospital Medical appointment.

The nonproduction to this medical appointment the plaintiff believes that the defendant CAPTAIN GAINES is behind as a form of retaliation because she is the Security captain and directly in charge of the movement of Court Order Lockdown Inmates at the facility.

As a result of this non production the plaintiff was not able to address the medical condition of him having the pains in his side where the Organ was removed, suffering from vomiting, hoit flashes and defecation of blood. The same systems are listed on the plaintiff medical discharge papers as being a negative and needing to return back to hospital if occurred.

On Nov 4, 2022 at approximately 6:00pm when the plaintiff was returning from Court outside of his housing unit Defendant Preston Ritter was in front of housing unit 2a door and stated to the plaintiff I told you I was going to get you to drop your lawsuits I brought Cano Back to violate you.

Once inside of the housing unit the plaintiff was locked into his cell which is cell 11 and inmate Christopher Cano began to yell through the connecting vent from cell 12 that Officer Ritter and Captain Gaines brought him to be locked right next to him and informed him if he wanted to go back to population that he needed to "BANG" on the plaintiff. CO Ritter and Captain Gaines are named defendants herein.

It is also important to note that Christopher Cano is named in the matter of WILLIAMS V. CITY OF NEW YORK ET AL, 22-CV-3819(PGG)(KH0)

as being housed in a Court order Lockdown Housing unit without being a court order inmate to retaliate against the plaintiff for his lawsuits and grievance against the defendants.

On Nov 5, 2022 during 7-3 tour the plaintiff wanted to use the phone but opted out due to concerns that defendant ANDREW HICKSON would not allow him to speak with his attorney in private and confidential manner.

On Nov 5, 2022 during the 3-11 tour the plaintiff wanted to use the phone again to discuss the proceeding of court the day before and to advise his attorney that defendants' named herein had placed inmate Christopher Cano next door to him in a act of retaliation by information that Cano voiced to the plaintiff, but was unable to do so and opted out of using the phone due to the CUSTOM, USAGE, PRACTICE, PROCEDURE OR RULE where defendant listened, recorded and monitor plaintiff conversation with his attorney. (FOR EVIDENCE OF THIS USAGE, CUSTOM, POLICY THE PLAINTIFF REQUEST THAT FOOTAGE FROM HOUSING UNIT ON NOV 5, BE PRESERVED FOR WHEN DEFENDANT ANDREW HICKSON AFFORDED INMATE KWAIN THOMPSON A CALL DURING 7-3 TOUR AND WHEN DEFENDANT KEVIN YOUNG AFFORDED INMATE KWAIN THOMPSON A CALL ON 3-11 TOUR, SO THAT THIS VIDEO WILL BE PRESENT DURING COMMENT OF DISCOVERY PROCESS.)

On Nov 7, 2022 at approximately 10:25 am while in the law library cell of cell 7 on housing unit 2a inmate Christopher Cano came to the cell door and told the plaintiff that he didn't want any issues with him but that CAPTAIN GAINES ordered him that the only way that he would get back to 71a where he had come from was for him to violate the plaintiff and "BANG" ON HIM. Inmate Cano was referring to defendant CAPTAIN GAINES, mentioned herein as a defendant in this matter. (THE PLAINTIFF ASK THAT THE FOOTAGE FROM THIS TIME AND DATE DISPLAYING SUCH BE PRESERVED FOR DISCOVERY PURPOSES).

On November 9, 2022 the plaintiff again grieved the existance of being detiness in a segregated confinement unit such as one with him being held in a cell 23 hours a day and appealed the factor to New York City Department of Correction "EXECUTIVE OFFICER OF O.S.I.U. See EX-27.

EX-26 herein is a copy of the New York state Bill that passed into law on Janurary 25, 2021 banning all forms of solitary confinement from New York State and New York City jails.

Number 11 3 - 9 defines "SEGREGATED CONFINEMENT" as being any form of confinement to a cell for more than seventeen hours per day.

It also banns the restrictions for any inmate that has a mental health medical record of any mental illness.

The plaintiff has displayed herein that he fits both criterias and that the defendants name herein are well aware of such but contiuned to violated the protced rights gaurantted to him by the US Constitution and the New York State Constitution.

In review of the bill seen herein as EX-26, there is no exception stated for a title Court order lockdown or Judicial order lock down, even though if there wqas the plaintiff would fall under the menatl health exemption of the bill.

The defendnats CITY and DOC are entities that are well aware of the fact that a Judge Order can never over ride a State Law. Thus leaving them no defense or plausible deniability claims.

On November 9, 2022 at approximately 12:15pm defendnat ANDREW HICKSON came to afford the plaintiff lergal call in whihc he again spoke with Julie A. Clark whihc left her not wanting to disucs the plaintiff case because of such and out of concern that defendnat ANDREW HICKSON was standing near where he would be able to hear ease drop on plaintiff's conversation with attorney. (PLEASE PERSEVE FOOTAGE FORM THIS DATE AND TIME FOR DISOCVERY PURPOSES), afterward defendnat ANDREW HICKSOIN

PROCEEDED TO USE THE PHONE TO CONDUCT PLAINTIFF'S COMMISSARY FOR HIM NOT ALLOWING THE PLAINTIFF TO DO SO HIMSELF AS SOOME FORM OF PUNISHMENT OR RETALAITION.

On NOVEMBER 10, 2022 AT APPROXAMATELY 6:15PM inmate Kwaine Thompson B&C # 349-190-1450 was taken to the clinic area for DOT medication when he ran into defendants KEVIN YOUNG & CAPTAIN GAINES, who told him that they were aware that the plaintiff ALEXANDER WILLIAMS JR was preparing for trial coming up and tha t they were not going to be coming with the phone tonight and tha t they were going to make sure that he isnt allowed to speak with his attorney, unless he drops his suit.

From this the pllaaintiff was able to conclude that the defendants, CAPATIN GAINES, ANDREW HCISKOSN, KEVIN YOUNG, PRESTON RITTER, GRAVES AND others was indeed engaging in a campaign of retaialiation that was geared towards affecting the plaintiff in matters of his criminal and civil case outcome.

On Novemebr 11, 2022 defendant ANDREW HACKSON, attempted to pprovide legal call for the plaintiff, but failed to give the plaintiff the proper confidentailaity in regards to hsi SIXTH AMEND and the plaintiff left such statement on the camcord camera with defendant ANDREW HICKSON that day.( THE PLAINTUIFF ASK THAT THE VIDEO FROM THIS DATE AND TIME BE PERSEVED FOR DISCOVERY PURPSES.)

IT IS IMPORTANT TO NOTE:, that after the plaintiff made a statement on the camera tha tday that defendant ANDREW HICKSON, stopped from talking to the plaintiff ALEXANDER WILLIAMS JR, attorneys and private investigators whenever affording a call, but continued to stand in ear distance and listening to the converstation,(PLAINTIFF REQUEST BOTH HOUSING UNIT FOOTAGE AND CAMCORDED FOOTAGE FROM 11/11/2022 FROM CELL 7 ON UNIT 2A WHERE HE WAS LOCATED WHEN LEGAL CALLS WERE CONDUCTED)(PLEASE PERSEVE THIS FOOTAGE FOR DSICOVERY PURPSOES), and that the stoppage of intrusion

is clearly an admission and/or a consciousness of guilt by defendant ANDREW HOICKSON , in the conduct that was wrong in regards to plaintiff confidence in tha this conversation with attorney's were confidential.

The plaintiff is an observer of MESSIANIC JUDAISM and this includes the religious dietary of Ksoher meals, with grape juice and Matzag bread/cracker and when the plaintiff mentioned the lack of and/or restriction of Kosher meal he is speaking and inclduing grapoe jucies and Matzah crackers as well.

In a recent case out of NEVADA district court the Courts established allowing a plaintiff to move pass dismissal stages with the claims of violation against FIRST AMENDMENT'S FREE EXECERISE CAALUSE, on the basis of restricting an inmate from his relig#ous dietray in Kosher meals, See RUIZ V. NEVADA DEPARTMENT OF CORRECTION., 2022 U.S. DIST. LEXIS 47633 (D. NEV. FEBRUARY 24, 2022) .

In this instance herein the plaintiff submits written policy from defendant CITY, JEAN RENNE, LISA BARNBEY, TIFFANY MORALES, JOANNE MATOS, JONEELL SHIVRAJ and enfocred under defendnat WARDEN COURT that clearly states that Courtt order inmates are not allowed to posess practice any other religious text or believt that are not a BIBLE and tied to the CHRISTAIN believth and that is how correction officers at GRVC enforces such polciy from there own interruption of said polciyas seen herein EXHIBIT-34.

The plaintiff herein submitted numerous griavnces where he had to grievance to the fact that numerous officer siexed his TORA while conducting facility seraches and even on greiavnces the response was very bleak into the reason why plaintiff is not allowed to posess a TORA whihc is trickled down into a restriction plaaced on the plaintiff religious dieaty whihc in both instance he isnt given NOTICE or a hearing as to why this polciy existed and is being enforced upon him.



On December 2, 2022 the plaintiff was transferred from GRVC facility to WEST Facility Sprung 6 cell 9.

While being transferred from GRVC Defendant Preston Ritter stated to the plaintiff as he was walking from housing unit 2a to the bus for transfer that the plaintiff was going to get violated by his call at the facility that he was going to go and that he personally made sure that there was no way for him to file any grievance because he had learned that if plaintiff didn't file a grievance case would not be able to move forward in the Court.

Plaintiff believes that Defendant PRESTON RITTER was able to understand such due to being named as a defendant in two separate litigation involving the plaintiff.

Upon arriving at West Facility Sprung six cell nine the plaintiff was placed in a cell with three cameras inside of it and no working hot water in the shower area.

When the plaintiff went to grieve of regards to this matter he became aware that the unit that he was in did not have a grievance box and the correction officers did not store grievance forms stating that West Facility was a hospital and not an actual jail where inmates were held for long.

With this being a factor the plaintiff assert that defendants and/or CITY were estopped in reason why the plaintiff was not able to exhaust his remedies in pursuant to PLRA 42 U.S.C. § 1997, and since plaintiff phone line in restricted to only being able to dial the numbers listed on his Court Order the plaintiff was also robbed of being able to contact 311 to formally lodge complaint in the timely fashion governed by the grievance policies of NYC DDC. And for this reason the plaintiff ask that the defendants

be estopped by the courts from asserting the defense of nonexhaustion due to the fact that the Department of Corrections itself prevent the plaintiff from exhausting his remedies, citing RIVERA V. PATAKI, 2005 U.S. DIST LEXIS 2747.

THE plaintiff complained of cold water throughout his entire time of being detained in sprung six cell nine and when maintenance did come after weeks of him having to wash up in cold water he was told the valve was broken and couldn't be fix and yet the plaintiff was not move to one of the open cell such as 610 or 612.

On Dec 03, 2022 the plaintiff attempted to call sickcall by dialing 614# as instructed by DOC policies and was unable to do so to make an sickcall appointment about the pain he was feeling in his rectum area since a Use of Force with DOC members a year prior.

This went on everyday for over a week until the plaintiff was successful in getting the doctors attention where he was seen and the doctor found out that the plaintiff was bleeding in his rectum area and may need surgery for hemroid removal and more.

The plaintiff was prescribed pain medicine and was appointment made for surgery with outside hospital, along with given peripiration -H subpository.

1. The plaintiff is a Jewish inmate and by his religion believe that he should not be seen by anyone other than his wife naked without violating his religious belief.

2. The sprung that the plaintiff was living in sprung six cell nine was made up of entire glass which allowed correctional officials female and male to view the plaintiff at times when he was in the shower or using the toilet to sit down and/or stand up. This lead to the Preservation of footage made by the plaintiff on the front page of this civil suit.

The constant surveillance of the plaintiff inside of his cell also violate this first amendment rights durring being recorded while praying and or showering without due process as well as equal protection rights whereas no other inmates are subjected to the same or all the inmates or not sunjected to the same care and tretament.

On Janurary 7, 2023 the plaintiff was place din Enhance restraint set up with shackles to be taken to the yard by defendants ANDERSON & RECREATION CAPTIN who was assigned to the recreation that day. The plaintiff presented DOC documentation displaying that he was not an Enhance Restraint inmate but was told by these two defendnats that they must place me in this set up every time that I exis my cell untold I drop my law suit against Cheif LEMON, speaking in regards TO ALEXANDER WILLIAMS JR V. CITY OF NEW YORK ET AL, 22-CV-3819 (PGG) (KHP) . WHEN The plaintiff complained that such was illegal to do both defendnat conversed and stated that they will be okay because this was the Court Order Lockdown Polciy for NIC whihc West facility falls under.

1525. The plaintiff understood the statements made to him descibed in ¶ 14 to be a Custom Polciy being practcied and a violation of his rights pursuant to 42 U.S.C. § 1985(2)(3), wheras the plaintiff is a party and a witness in the matter of ALEXANDER WILLIAMS JR V. CITY OF NEW YORK ET AL, 22-CV-3819 and yet the defendnats where attempting a qixchange to not violate the plaintiff rights by unlawfully placing him in enhance restraint if he dismiss a penidng suit against a DOC Cheif. The plaintiff is also privilaged not to be placed in an Enhance Restaint Set up with out first being given some form of Due Proces of the law .

During this engagement with the defendnats there was a seprate Correction Officer who went and looked up the plaintiff classification staus in the computer in the sprung bubble and came back and informed the Recreation Captin and Defendant ANDERSON that the plaintiff was correct

and advised against placing such restraint on plaintiff. This correction officer name was CO Colloazo and he safe guarded himself by placing a notation in the log bog inidscatling that the recreation capatin was giving defendant ANDERSON an order to use set up bn plaintiff.

On the afternoon of Januaray 06, 2023 at approximately 6:30pm defendant Deputy Warden Miller accompaigned by defendant CO Phillup sheild number 12252 was present in the plaintiff sprung and came to his door of cell nine and stated "I CAME HERE JUST FOR YOU", "MY GUY PHULLIPS HERE IS GOING TO HAND CUFF YOU AND TAKE YOU CELL TEN FOR YOU TO TYPE A LETTER DROPPING YOUR CASE AGAINST MY MAN LEMON", The defendnat DW MILLER than stated to the plaintiff " I DONT GIVE A FUCK WHAT HAPPNED IN GRVC I AM MAKING A SPECIAL POLCIY FOR YOUR ASS AND YOU WILL BE ENHANCE RESTRAINT IN MY FACILITY". Afterwards CO PHILLUP opened the plaintiff slot and hand cuffed him and took him over to cell ten where a type writer was located, the plaintiff also became aware that after this date he was classifed an being enhance retrsaint and tretaed as such each time that he came out of his ceel without being aforded due process under the state and federal law.

The plaintiff took the alleg<sup>above</sup> T directly as a threat or intimidation whihc vioplated his federal rights pursaunt to 42 U.S.C. § 1985(2)(3) and that the defendnat DW MILLER would and did engage in the creation of a polciy custom that lead to the mistreatment and enhance restarint agauist the plaintiff. The defendnet's MILLER and PHILLUP directly stated that their mistretament would in relation to a pending civil federal case where their boss is named as a defendant see ALEXANDER WILLIAMS JR V. CITY OF NEW YORK ET AL, 22-CV-3819, where defendnat CHARLTON LEMON is named as a defendant in the matter.

On January 07, 2023 at approximately 1:45pm the plaintiff asked defendant CO <sup>Orellana</sup> ~~BARREIRO~~ for a grievance form and if he could drop siad grievance

in a grievance box in another sprung so that the plaintiff could somehow bring attention to what was going on with him.. In response defendant CO ~~ORELLANA~~ <sup>ORELLANA</sup> informed the plaintiff that he had two years left before retirement and that he could not and would not go against Chief LEMON for that matter. Defendant CO ~~ORELLANA~~ <sup>ORELLANA</sup> went on to advise the plaintiff that it was stupid of him to ~~start a lawsuit~~ against the chief of the department and that it would be wise if he dismissed the suit like he was told to do. Defendant FARRINAS then asked the plaintiff if he thought that he shower water was cold by mistake or that it was cameras in his cell because he was just that ~~unlucky~~ unlucky.

~~ORELLANA~~ <sup>ORELLANA</sup> The statement alleged in the above <sup>Above</sup> ~~was~~ allowed the plaintiff to believe that defendant ~~ORELLANA~~ <sup>ORELLANA</sup> and other defendants named and unnamed was aware of the fact that the plaintiff had cold water coming out of his shower as some form of punishment and that was the reason why he was not moved to one of the open vacant cells and furthermore was being instituted due to the plaintiff health and direct violation of the plaintiff's federal rights pursuant to 42 U.S.C. § 1985(2)(3) and that defendant FARRINAS was not going to prevent harm or prevent further violation of the plaintiff rights as pursuant to federal statute 42 U.S.C. § 1986.

~~ORELLANA~~ <sup>ORELLANA</sup> Later on during the day of January 07, 2023 the plaintiff attempted to get defendant CO ORELLANA who identified himself as working in head quarters to assist him with getting his shower water to be hot and with a grievance form. In return Defendant ORELLANA informed the plaintiff that he knew who the plaintiff was because he had written about his boss and associates in his book titled 'THE TRUE UNTOLD STORY OF NEW YORK CITY'S NOTORIOUS RIKERS ISLAND', defendant ORELLANA then went on to inform the plaintiff that he would not give him a grievance and he didn't care about his water being cold, he asked the plaintiff why would he attempt to ask him for assistance when he was already told by everyone that he was dead on everything until

he dropped his lawsuit on chief LEMON.

The statement alleged above ~~in 1985~~ lead the plaintiff to understand that defendnat ORELLANA was aware of the plaintiff rights being violated and failed to prevent further violation pursuant to 42 U.S.C. § 1986 and that the plaintiff also was willing to retaliate or engage in conduct that was intimidating or otherwise attempting to affect an ongoing civil federal case which placed defendnat ORELLANA in violation of the plaintiff's right pursuant to 42 U.S.C. § 1985.

On January 07, 2023 at approximately 7:35pm the defendnat heard a bang at his door and saw that it was an specialized correction team who he later became aware of was SRT (Strategic Response Team), where one of the team member was placing a mask on his head and displaying his MK-8 spray in his hand and ordering the plaintiff to get naked and stand in the middle of the floor and await instruction. The plaintiff later saw that the SRT team member who gave him this order had the number # 79 on the back of his vest thus naming SRT #79 as a defendnat herein. (THE PLAINTIFF DEMAND THE PRESERVATION OF HIS CELL CELL SPRUNG SIX CELL NINE FOOTAGE FROM JANUARY 7, 2023 7:35PM - 11:30PM BE PRESERVED IN SUPPORT OF THIS CLAIM)

The plaintiff stood in the middle of his cell naked for over an hour and half while numerous defendnats came and turn on his light to ensure that he was standing liked order and to also put him on display for other officers both male and female who made fun of the plaintiff.

During the time period in which the plaintiff was standing naked in the middle of the cell with his hands behind his back as ordered by defendnat SRT #79, the plaintiff became aware that the inmates across from him was staring into his cell since the entire cell is made of glass and began master batting to him.

Also during this time period the plaintiff became aware that SRT officers were telling a white female dressed in civilian clothes wearing a



gold badge with dirty blonde hair, was staring into his cell as he stood naked with his hands behind his back as ordered by SRT #79.

Defendant K-9 officer PERPIGNAN walked by with the dog and turned the light on to ensure that the plaintiff was standing naked as ordered by SRT 79 and then informed the female SRT officer who was acting as the camera woman on that day to look inside of the plaintiff cell while he was standing naked with his hands behind his back as ordered by SRT #79 and made a joke where the camera female officer began laughing.

Also during this time period while the plaintiff was standing inside of the middle of his cell naked with his hands behind his back he witnessed SRT#6 came to his door and turned the light on to also ensure that the plaintiff was doing as he was ordered by SRT #79. This is how defendant SRT #65 and female SRT camera woman is named as defendant herein.

After nearly two hours of standing in the middle of his cell naked and with his hands behind his back defendant SRT #77, Captain #88 and #112 entered the plaintiff cell and ordered him to step forward. When the defendant #77 and 88 saw that the plaintiff was within a foot or so in front of the plaintiff to bend at his waist and spread his ass cheeks until they saw his hemorrhoid. The plaintiff did as he was ordered as trying his best not to get into any physical altercation with these defendant.

THE PLAINTIFF DEMANDS THAT THE FOOTAGE FROM THIS NIGHT OF JANUARY 7, 2023 FROM 7:35PM - 11:30PM BE PRESERVED FOR EVIDENTIARY PURPOSES).

While searching the plaintiff cell afterwards SRT #112 and #77 commenced searching the plaintiff cell all the while explaining from the inside under their mask that all of the plaintiff's problem could go away if Chief LEMON was no longer in his law suits. This is unique because in the matter of ALEXANDER WILLIAMS JR V. CITY OF NEW YORK ET AL, 22-CV-3819 (PGG) (KHP), THE PLAINTIFF ALLEGED AND admitted supporting documentary



evidnece that DOC Cheif CHARLTON LEMON misised the Strategic Response Team in a retaliatory fashion due to me suing him over the illegal banning of the plaintiffg book titled "THE TRUE UNTOLD STORY OF NEW YORK CITY'S NOTORIOUS RIKERS ISLAND".

The plaintiff became aware that during the search that atheir was an SRT capatin displaying the number #4 on the back of his vest that was supervsailing the conduct that these defendants were engaging in, this allowed the plaintiff to understand that their conduct of making him stand up naked in the middle of his cell on display with his hands behind his back for hours was soem form of punishment, retaliation and intimidation in an ongoing civil federl lawsuit whine violatedxthe plaintiff constitutional rights pursuant to 42 U.S.C. § 1985~~555xxxxx~~(2)(3) and leaving each of the defendnats guilty and/or liable in pursuant to 42 U.S.C. 1986 for failing to prevent futher harm while each of the defendnats watch or owthersie directly took part in the conduct while the other defendnat enagaged in violation of the plaintiff rights.

The plaintiff later learned from inate Kwaine Thompson that while searching his cell that some of these same defendants and other members of the same SRT team on January 7, 2023 discussed the fact that they were ordered to violate the plaintiff in order to get him to stop his litigatio against chief LEMON and that they were not going to violate his cell but the message along to plaintiff, Thompson for him to pass ~~xxxxxxxxxxxxxxxxxxxxxxxx~~, Seexhibit-<sup>28</sup> for Kwaine ~~xxxxxx~~ ~~xxxxxxxxxxxxxxxx~~witness statement.

The plaintiff would like to note that each time that he was earched it was in front of three cameras that are in his cell and the date are as follwed, januaray 3, 2023, Januaray 4, 2023, Januaray 5, 2023 January 6, 2023, Januaray 7, 2023, January 10, 2023. THE PLAINTIFF DEMAND PERSERVATION OF THE FOOTAGE INSIDE OF CELL NINE SPRUNG SIX FROM THESE DATES FOR EVIDENCE REASONS.

On January 3, 2023 approximately 2:30pm defendant Capatin Fluka and ADW GWINNIE of the CIB unit of NYC DOC conducted a search on the plaintiff by rushing his cell while he was using the bathroom and ordering him to strip nakle on Camera #x before allowing him to exit the cell and observe the search. While the plaintiff was being stripped by two unknown CIB officers who are unidentified due to them wearing black mask and wearting no identifying name tags of badges the plaintiff heard defendant Captin Fluka of the CIB Team get called by defendnat ADW GWudnnie and converse with a White male in civilain clothes and light grey hair who the plaintiff takes to be an assistant commissioner name ~~xxxxxx~~ <sup>MULLER</sup> and over heard the defendants ADW Gwiune and defendnat capatin Fluka of the CIB unit nod their heads and respond saying yes boss. Afterwards defendnat ADW Gwinne walked pass the plaintiff telling him that he neds to drop his suit as soon as possible of bear the wrath. Munites later ~~ADWxxx~~ defendnat Captain Flika walked into plaintiff cell and the plaintiff over heard him saying through mask/or under his breathe that the plaintiff will be minimum standards and enhance restraint until LEMON tells him the suit is drop.

Both defendants ADW Gwinnie and Captin Fluka of the CIB team are well aware that the plaintiff must be afforded a hearing before being placed in enahnce restraint set up and by the conduct absserved by the plaintiff and mentioned herein it is clear that both these defendnat willingly engaged in conduct that violated the plaintiff rights pursuant to 42 U.S.C. 1985 and 42 U.S.C. 1986 along with 42 u.s.c. 1983 by retlaitaion, intimidating a witness or party in a federal case and preventing or failure to prevent harm or violation of the plaintiff rights.

It is important to note that all of this occured after the plaintiff was notified by coporation counsel that the city LAw Department had not yet decided whether they would represent CHARLTON LEMON in a legal capacity in the matter of ALEXANDER WILLIAMS JR V. CITY OF NEW YORK ET AL, 22-CV-

On Jan 4, 2023 the plaintiff was stripped searched again by ESU and SST team members all while being recorded on the three cameras in the cell naked. (THE PLAINTIFF DEMAND THAT THE FOOTAGE FROM HIS CELL ON THIS DATE BE PRESERVED FOR EVIDENCE REASON AND TO ENSURE THAT THE EVIDENCE IS AVAILABLE WHEN DISCOVERY COMMENCES IN THIS ACTION).

On Jan 08, 2023 the plaintiff was ordered to be placed in Enhance Restraint with mittens and shackles if he wanted to go to his (1) recreation. The plaintiff explained to Defendant SRT Captain #1 and SRT officers #75 and SRT Defendant #80, While defendant SRT #133 held the camera they had the plaintiff strip naked inside of his cell even though explained that he did not want to be recorded naked and afterwards used the enhance restraint set up on the plaintiff.

Once outside to recreation defendant SRT <sup>80</sup>~~80~~ informed plaintiff that he used to be an officer assigned to CMC classification and was aware that the plaintiff status was only court order and not CMC but that the situation was bigger than him and he had to follow the captains orders. This statement informed the plaintiff that at minimum defendant SRT #80 was aware that he was engaging in conduct that violated the plaintiff's right but felt obligated to do so out of concern of not following his captains orders.

The plaintiff classification number is a 4 which is minimum and one of the lowest within NYC department of correction out of the Approximately 7,000 inmates. The plaintiff has never been afforded a hearing nor notification informing him that he was designated as a Enhance Restraint inmate and when his attorney's Julie Clark and Jeffrey Chabrowe brought this factor up to the Judge who signed the plaintiff JLO order the judge stated that Enhance restraint was not a restriction listed on his order.

Exhibit ~~30~~ listed/shown herein is a copy of DOC policies on Enhance Restraint and Pg 2 17 list the criteria for an DOC inmate to meet before

subjected to being classified by DOC as being Enhance Restrict:

- A. INMATE ASSAULTS OR ATTACKS STAFF OR ANOTHER INMATE;
- B. INMATE CAUSES SUBSTANTIAL PROPERTY DAMAGE OR PLACE PERSON IN HARM;
- C. INMATE ATTEMPTS TO ASSAULT OR ATTACK STAFF OF ANOTHER INMATE

In Addition, any inmate found in possession of a scalpel, hobby knife, razor blade, or other dangerous instrument as defined during his/her current or prior incarceration within the last five years may be placed in Enhance Restrict status.

The plaintiff have been locked up in the custody of DOC since March 2018 which is 50 days shy of five years and has never been found guilty of a misbehavior or criminal charge that reaches the level listed in Exhibit-C on this incarceration on in any other bid.

This supports that the plaintiff Due Process rights were in deed violated and that defendants knew that the plaintiff was not enhance restrict by way of the pedigree that is posted on his door which each defendant sees and records each time before the plaintiff is placed in set up. This pedigree clearly states that the plaintiff is not RED I.D./ENHANCE RESTRICT/ICR/OR ESCAPE RISK.

Furthermore Exhibit 30, Pg 7 ¶ 2 lays out the Due Process right of each pretrial detainee when it comes to being placed in Enhance Restrict with stating that the plaintiff/inmate must be given notice of such within the first 72 hours and a departmental hearing shall follow. The plaintiff was never afforded either of the two.

At 12:4 on Jan 08, 2023 the plaintiff was told by one of the SRT team members who vest had no numbers and he wore a mask that he could not get any cold water and tow drink for the shower or the sink for all he cared. Since that period the plaintiff only drunk water from his shower area which the cameras in his cell will support. That is WHY PLAINTIFF AS THAT ALL FOOTAGE FROM CELL NINE BE PERSEVED FOR THE PURSUE OF EVIDENCE AND EXAMINATION OF OTHER CAUSES OF ACTION IN THIS MATTER.

ON JAN 08, 2023 mid day the plaintiff was subjected to being recorded by the three cameras in his cell while showering and praying and again at 8:15pm the same day.

On Jan 09, 2023 the plaintiff was subjected to being recorded showering at 8:00am by the three cameras inside of his cell that was not inside of every other inmate cell which the plaintiff attest is a violation of the Equal Protect Clause of the federal constitution..

On Jan 09, 2023 the plaintiff was subjected to be recorded naked while praying at 8:15am which the plaintiff attest is a violation of his religious rights pursuant to the first amendment and 42 U.S.C. § 2000cc.

On Jan 09, 2023 the plaintiff got the attention of SRT defendant SRT #75 and informed him that he needed sick-call because he was bleeding out of his rectum area and feeling pain that was unbearable. In response defendant SRT #75 told the plaintiff that that was not what he was here for to hold it down. This left the plaintiff in severe pain and bleeding out of his rectum area without any medical services, even though the doctor's office was five feet away from defendant SRT #75.

On Jan 09, 2023 the plaintiff was informed by defendant SRT #75 that he was getting no Rec, No Law Library, No Mail and No sickcall as long as he had open litigation against LEON. Hearing this the plaintiff recognized that defendant SRT #75 was referring to the matter of ALEXANDER WILLIAMS JR V. CITY OF NEW YORK ET AL, 22-CV-3819 (PGB) (KHP), which was also a violation of the plaintiff's rights pursuant to 42 U.S.C. § 1985(2)(3), where it was obvious that the denial of basic rights and needs was being implemented against the plaintiff as a form of retaliation, and intimidation of a party/witness in an ongoing federal civil case, as well as violation of the plaintiff rights pursuant to 42 U.S.C. 1985.



On Jan 09, 2023 defendant DW MILLER and Defendant CO Phillip Sheld number 12252 enter the plaintiff housing unit along with conversating with Defendant SRT Captain #1 and stated in ear shot of the plaintiff Defendnat DW MILLER stated make sure he does not recive or send out any mail of any sort and that he has enhance restarint on at all times even when seeinghis att attorney. At 10:30am the plaintiff contacted his attorney Julie Clark to make a formal comaplint since there is no grievance system in sprung six and the plaintiff pin is block from dsailing 311.

On Jan 09, 2023 at 11:05am the plaintiff asked defendant SRT #75 if he could send out mail addressed to the PRO\_SE INTAKE of the UNITED STATES DISTRICT COURT, SOUTHERN DISTRICT OF NEW YORK, NEW YORK NY 10007. This mail was the plaintiff objecting to the defense request for a second extention in the matter of ALEXANDER WILLIAMS V. CITY OF NEW YORK ET AL., 21-CV-1083 (PEG) (KHP), without the plaintiff responding in the allotted time frame the court will make a decison on the request without taking his objection into consideration. Due to the defendnats denial of allowing the plaintiff to access the court that is exactly what happen in the matter. This denail constituted a violation of the plaintiff First Amendment rights and right to access the Courts as well.

On Jan 09, 2023 at 11:44am defendant SRT 108, the plaintiff when he asked for water to drink shower water like he was told. This denial could seen on plaintiff cell footage and~~22A~~ for that reason the p-laintiff DEMAND that the footage from this dater and time be perseved so that it is aviavalable for discovery to use as evidence in this action. The drinking of plenty fluids was the plaintiff way of attempting to self heal from his hemroid issue by ensuring tha the drunk alot so that his stool was soft. The plaintiff explaine this to SRT #108 and asked for sickcall whihc SRT #108 simply walked away without responding to plaintiff resquest.

On Jan 10, 2023 at 7:30am the plaintiff was recorded by the three cameras in his cell taking a shower. THE PLAINTIFF DEMAND PRESERVATION OF THE CELL FOOTAGE ON THIS DATE AND TIME SPECIFICALLY TO BE USED AS EVIDENCE IN THIS ACTION.

On Jan 10, 2023 at 7:39am defendnat SRT #113 came to plaintiff door and asked him if he was ready to drop his lawsuit against LEMON after getting off of the phone at the desk. The plaintiff concuded this question as a threat.

On Jan 10, 2023 at 7:45am the three cameras in plaintiff cell recorded him enagging in religious activites such as praying and reading from the TORA. THE PLAINTIFF ASK THAT THE FOOTAGE FROM HIS CELL THGIS TIME AND DATE BE PERSVED FOR EVIDENCE IN THIS ACTION.

On the morning of Jan 10, 2023 at approximate 8:30am the plaintiff was ordered by ESU and SST Special Search Team to get naked and strip, this took place on the cameras recording inside of the plaintiff cell. During this time while getting naked the plaintiff was again placed on display for the following defendnats who were present and failed to stop what was taking place: DEFENDNAT ESU CAPATIN RIVERA, ~~DEFENDNAT ESU CAPATIN #28 ON VEST~~ ESU CAPATIN #28 ON VEST. One of these defendnats placed the plaintiff light on so that he could be viewed while nakled by each of them ~~insulting and~~ ~~on the camera~~ ~~on the camera~~.

DURING THIS TIME OF BEING MAKE THE PLAINTIF FBECAME AWARE THAT DEFENDANT ESU Secratary bearing the sheild number of 4190 was at the desk looking at him inside of his cell naked and making jokes along with other ESU, SST and DOC officilas present.

On Jan 10, 2023 11:00am defendnat <sup>Mathias</sup> Captain ~~Mathias~~ and defendnat SRT #73 was present and placing the plaintiff in Enhance restrarint set up to go to the yard. It is important to note that defendant Capatin Bernard



was the security captain when the plaintiff was on the same status in MDC and has direct knowledge that the plaintiff is not Enhanced Restraint Classification. Furthermore defendant Captain Bernard Mathis is a defendant in the matter <sup>21-cv-1083</sup> of WILLIAMS V. CITY OF NEW YORK ET AL., AND HAS FOUND TO BE LIABLE FOR VIOLATION OF PLAINTIFF DUE PROCESS RIGHTS AND FOURTEENTH Amendment VIOLATION RIGHTS FOR THE EXACT SAME CONDUCT SEE THE REPORT AND RECOMMENDATION OF magistrate Judge Katharin H. Parker on August 05, 2022 in WILLIAMS V. CITY OF NEW YORK ET AL., 21-CV-1083 (PGG) (KHP).

On Jan 10, 2023 defendant Captain Mathis and defendant SRT #75 used the enhanced restraint set up again on the plaintiff at 12:35pm. EACH TIME THAT THE PLAINTIFF ATTEST THAT ENHANCED RESTRAINT SET UP WAS USED ON HIM, DEFENDANT DID SO USING A HAND HELD RECORDER TO RECORD THIS AND THE PLAINTIFF DEMAND THE PRESERVATION OF SAID FOOTAGE THROUGHOUT EACH TIME THAT HE MENTIONED AND/OR LIST THE USGAE OF ENHANCED RESTRAINT ON HIM WITHIN THIS COMPLAINT.

On Jan 10, 2023 the plaintiff was told by defendant captain Bernard Mathis that he can not send or receive any mail from anyone including the courts. This was a direct violation of the plaintiff's first letters going to attorney's that he does not have on his calling list and writing is the only way of contact. Those attorney's are as followed Christie Wan of Paul, Weiss, Rifkind, Wharton & Garrison and Sabina Khan which you can see from Exhibits 31 & 32 are attorney's that represent the plaintiff in one fashion or another.

On Jan 11, 2023 at 7:45am - 8:20am the plaintiff was recorded naked in his cell by the three cameras. AGAIN THE PLAINTIFF DEMAND THE PRESERVATION OF THE CELL FOOTAGE FOR EVIDENTRY REASON IN THIS ACTION.

On Jan 11, 2023 at approximately 9:20am SRT defendants SRT #75 & #74 while standing in front of the plaintiff's door responded to plaintiff's concerns about his rights being violated by stating, "WE ARE GOING TO DO

WHAT THE FUCK CHEIF LEMON AND ASSIANT COMMISSIONER (NO NAME) TELL US TO DO FUCK WHAT THE COURT SAY, WE ARE SOILDERS THEY WILL DEAL WITH ALL OF THAT COURT SHIT".

AT 10:00am on Jan 11, 2023 the plaintiff was once again oplaced in Enhance Restarint set by defendants SRT #75 & #74 to be taken to video conference with his attorney Sabina Khan. While being taken to court plaintiff spoke to defendnat Captin Bernard Mathis who was present and supervising the movement and personally ~~involved that the he was awre that the conduct~~ that was taking place was wrong. In response defendnat SRT #75 looked at the plaintiff fand then at defendnat Capt Bernard Mathis and stated to defendan that I got you. MATHIS I told you . THE PLAINTIFF DEMAND THAT THE FOOTAGE ON THE HAND HELD CAMERA OF THIS MOVEMENT FROM THIS DATE AND TIME BE PERSERVED FOR EVIDENTRY PURPOSES.

The plaintiff took the above mentioned stated and communication between defendnat SRT #75 and Defendnat BERANRD MATHIS was in deed conspiri and acting in conert to violate the plaintiff rights and did so fully aware that their conduct was wrongful in nature.

On Jan 11, 2023 at approximately 12:50pm against defendnats BERNARD MATHIS, SRT #74 & #74 illegally used the enhance restraint set up on plaintiff when he was leaving the west facility video conference area. Before these defendant commenced to using said set up on the plaintiff, he asked defendnat BERNARD MATHIS why was he doing this knowing that he was he captin over Court Order Status when the plaintiff was detained in MDC and had direct knowldege that the plaintiff was not clasified as being an Enhance Restarint Inmate. In return and out of Camera view defendnat BERNARD MATHIS simply shrugged his shoulders.


7. When the plaintiff was taken to that video call with his attorney Sabina Khan it is importnat to note that in the middle of his legal conference

that the video connect was apparently purely cut as soon as the plaintiff was heard expressing his complaints to attorney Sabina Khan and giving out identifying information in wrong to the defendants named herein this complaint.

On Jan 11, 2023 the plaintiff asked defendant BERNARD MATHIS if he couldn't send out mail and he couldn't meet with his attorney on video what was the issue with at least giving him a grievance form so that he could properly document the denial. In response defendant BERNARD MATHIS stated to the plaintiff that from being a defendant in prior litigation he learned a thing or two and knew that if there was no exhaustion there was no claim.

On Jan 11, 2023 the plaintiff was scheduled to be seen by Mental Health Staff MS KOONEY but was unable to do so because SRT and defendant Captain BERNARD MATHIS denied Mental Health Staff entry to the sprung for reasons unknown. (THIS LEFT THE PLAINTIFF UNABLE TO EXPRESS SUICIDE THOUGHTS)

On Jan 11, 2023 at approximately 2:30pm DEFENDANTS DEPUTY WARDEN MILLER and CO PHILLIPS shield 12282 entered the plaintiff housing unit and due to the plaintiff cell being positioned in front of the housing unit desk he was able to over hear the conversation these two defendants had with defendant BERNARD MATHIS. DW MILLER asked defendant MATHIS if the plaintiff was able to give his attorney any viable information to which defendant MATHIS stated no (THIS ALLOWED THE PLAINTIFF TO DETERMINE THAT DW MILLER AND MATHIS WAS DIRECTLY INVOLVED WITH THE PLAINTIFF'S VIDEO CALL WITH ATTORNEY BEING CUT OFF), DEFENDANT co phillips THEN GAVE DEFENDANT mathis A HUG AND THAT THE PLAINTIFF WAS NOT SUPPOSED TO RECEIVE ANY MAIL, SEND OUT ANY MAIL AND WOULD BE ENHANCED RESTRAINT UNTIL HE DROPPED HIS LAW SUIT AGAINST LEMON. In return BERNARD MATHIS defendant stated that he knows the routine and that as long as he was captain on the post the plaintiff was dead on everything.



This interfered with the plaintiff responding to the southern district objecting to the defense counsel request for an extension as seen herein as Exhibit-3B in the matter of ALEXANDER WILLIAMS JR V. CITY OF NEW YORK ET AL., 21-CV-1083 (PGG) (KHP), IT ALSO violate dthe plaintiff Sixth Amendment Rights from communicating with attorney's that represented him who he had mail waiting to go out to for over five days citing Sabina Khan, Eric Abrams, Tracie Sundack, Christie Wan, Hillary Black and Daniel Beller, who each represent the plaintiff in criminal and civil matters and communication with them were crucial due to the various stages in the cases and the fact that the plaintiff jail pin was restricted from calling these ~~xxxx~~few attorney after the Judge Vincet DelGuidice ordered him to be allowed contact with them to prevent any appealable issues in the plaintiff criminal case.

In the afternoon of Jan 11, 2023 approximately 2:4pm the plaintiff served from an asthma attack in his cell due to the cell no having any windows where fresh air could entered and the plaintiff alerted defendnat SRT #75 who told him to use his asthma pump because he was not calling medical for him. THE PLAINTIFF DEMAND THAT THE FOOTAGE FROM HIS CELL FROM THIS DATE BE PERSVED FOR EVIDENTRY PURPOSES.

ON JAN 11, 2023 AT APPROXAMETLY 3:45PM THE PLAINTIFF WAS VIDEO RECORDED TAKING A SHOWER AND BEING NAKED IN HIS CELL BY THE CAMERAS INSIDE OF HIS CELL THAT ARE NOT INSIDE OF ANY OTHER INMATE. (the plaintiff demand that the footage from this date and time be perserved for evidentry purposes.)

On Jan 12, 2023 at aprox 9:30am defendnat cepatin LOPEZ Sheild 462 informed the plaintiff when he asked that he was not allowed to send out or recive mail or receiev any grievance forms to submit and that this was Per Defendnat DW MILLER. Defendnat LOPEZ shiled 462 informed the plaintiff that he was just follwing orders so do not shot the little man. ( PLAINTIFF DEMAND THAT THE FOOTAGE FROM HIS CELL BE PERSBED FROM THIS DATE AND TIME).

On Jan 12, 2023 the plaintiff was ordered to strip naked while getting searched and recorded on camera at 10:45am by defendants Captain LOPEZ shield number 462, SRT #117 and SRT #135 shield number 8957.

On Jan 12, 2023 at 10:45am the three defendants named above in ¶75 illegally used the enhance Restraint on the Plaintiff even though there was a sign on the front of plaintiff door indicating that he was not (1) ENHANCE REDSTARIN, (2) RED I.D. (3) ESCAPE RISK AND (4) ICR INMATE.

On Jan 12, 2023 at 12:35pm the plaintiff was again placed in Enhance Restraint set up by defendant SRT #135 shield ~~8957~~ 8957, Captain LOPEZ shield 462. ( IS VERY IMPORTANT TO NOTE THAT THE PLAINTIFF USES A CANE TO WALK AND IS SEEN IN EVERY TIME THAT ENHANCE RESTRAINT MECHANICAL ARE USED WITH A CANE WHICH IS IMPOSSIBLE TO WALK WITH WHEN PLACED IN ENHANCE RESTRAINT SET UP)

On Jan 12, 2023 the plaintiff informed defendant Capt LOPEZ #462 and SRT 135- shield 8957 that he was in severe pain and having issue using the bathroom and was bleeding and that he wanted to be seen by sickcall as an emergency matter. In return the plaintiff was told that he could not see sick call until defendant ~~DW MILLER~~ 135 okayed it, by both defendant Captain LOPEZ shield 462 and SRT ~~135~~-shield 8957.

On Jan 12, 2023 while in the yard at approximately 11:30am the plaintiff was informed by security Captain Captain LACROX that he had an outside medical appointment at Bellevue hospital and that he was here to get him. Once the plaintiff was taken back inside by SRT defendant he was informed by defendant SRT 117 that he could not go to outside hospital per defendant ~~DW MILLER~~. IT IS IMPORTANT TO NOTE THAT THE HOSPITAL TRIP WAS FOR SURGERY ON THE PLAINTIFF HEMORRHOIDS AND FOR POST OP SURGERY FROM GALLBLADDER REMOVAL. It was also obvious to the plaintiff that his medical was being denied due to his litigation against Chief LEMON.

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On Jan 12, 2023 at approximately 5:30pm defendant ~~65~~ vest number ~~XXXXXXXXXXXXXXXXXXXXXXXXXXXX~~, rear cuff the plaintiff to be moved from cell 610 back to cell ~~609~~ where plaintiff was using unit base law library. This ocured even though the plaintiff has a cane and has two medical orders saying that due to medical issues plaintiff is to be side cuffed. (1) issued on 9/22/22 by NYC Bellvue prison hospital by DR SOMIL CHUGH MD and (2) issued by DOC DR BENJAMIN OKONTA MD on 9/22/22, both are known through DOC facilities but SRT defendants decided not to abide by this due to plaintiff ongoing litigation.

3111 1 As a result the plaintiff was in serve pain whenever he was transfered using rear cuff or not in accordance with the medical order issued by Two seperate doctors.

On Jan 12, 2023 at 5:45pm defendants #120, #82, and #139 rear cuffed plaintiff not allowing him to use his cane to go and see medical to discuss the incident that took place on Jan 7, 2023 described herein and other medical issues. Plaintiff explained that he needed his cane and defendant #120 can be seen on camera whispering in plaintiff's ear that he doesnt give a fuck. Furthermore while in meedical room talking with doctors about medical issues defendant SRT #139 stood in the dorr way listening and monitoring plaintiff meical examination that took place. Again the plaintiff described the two seperate medical orders that are listed within DOC for medical exemption in regards to cuffing in I 30 above.

On Jan 13, 2023 the plaintiff was stripped naked on camera in his cell at 8:55am by defendant Capt LOPEZ 462, SRT #113, #117, #203. (the plaintiff demand that footage from this incident in his cell at this date and time be perserved for evidnectry purposes)

On Jan 13, 2023 at 10:30am again the defendats mentioned above in I 30 will be seen in plaintiff cell camera using the Enhance restraint on him even though he is not an enhance retsreaint inmate. the PLAINTIFF AGAIN DEMANDS



PERSEVRVATION OF THE CELL CAMERA FOOTAGE IN REGARDS TO THIS DATE, TIME  
AND INCIDENT.

On Jan 13, 2023 between the hours of 9:00am and 10:30am while in the yard the plaintiff asked defendant Capt LOPEZ 462, SRT #203, and #113 for sickcall explaining that he was in serve pain and needed medical assistance and for a grievance and both were denied to the plaintiff without reason. Stating that they are SRT and do not do sickcall.

A6. Again on Jan 13, 2023 at approximately 11:30am the plaintiff asked defendnat SRT #77 and SRT Capt #3 for sickcall explaining in dept this time that he was bleeding from his rectum andf was in pain and needed medical assiatnce, when plaintiff see that these two defendnat s were not answering him but looking directly at him he asked for a grievance whihc seemed to infiriate defendnat #3 whihc lead to no futher answer.

On Jan 13, 2023 at 11:55am the plaintiff requested to use the law library cell in 610 which lead to defendants SRT #77, #78 #102 under the supervision of SRT Capt #3 being placed in entire enhance restraint set up with mittens to be moved ten feet to the next cell. The plaintiff took this as a form of retaliation for his asking for a grievance since he had never been placed in entire enhance restarint set up when being moved to law library cell prior to this date. (PLAINTIFF ASK THAT THE FOOTAGE FROM HIS CELL AS WELL AS HAND HELD CAMERA BE PERSRVED FOR DISCOVERY REASONS IN THIS ACTION)

36. On Jan 12, 2023 at 7:50pm the plaintiff was recorded in his cell naked while taking a shhower. THE PLAINTIFF DEMAND THAT THE FOOTAGE FROM THIS TIME AND DATE BE PERSVRED.

09. On Jan 12, 2023 the plaintiff asked defendnat SRT #55 for cleaning supplies to clean his cell because the dust and dirty was causing him asthma attacks and the plaintiff was told that he could not get this per defendnat Deputy Warden MILLER due to his lawsuits. This denial caused that plaintiff



to suffer from an asthma attack.

On Jan 13, 2023 at 1:50pm defendants SRT# 78 # 182 and ## 77 under the supervision of SRT Capt #3 used the enhance restraint set up on the plaintiff detain him to properly use the cane and disregarding his medical exemption due to his ongoing litigation against DOC officials and even though the plaintiff is not an enhance restraint inmate, THE PLAINTIFF DEMAND THAT THOSE FOOTAGE FROM THE HAND HELD CAMER BE PRESERVED FOR DISCOVERY REASONS. PLAINTIFF HAVING TO DEAL WITH SRT #77 WHO HE REMEMBERS FROM JAN 8, 2023 SEXUAL ENCOUNTER CAUSED PLAINTIFF TO BECOME STRESSED, DEPRESSED AND EMOTIONAL DISTRAUGHT.

On Jan 13, 2023 the plaintiff was told by SRT team members and captain SRT3# that he would not be able to send out regular mail or legal mail per defendant Deputy Warden MILLER, stating that the plaintiff knew what the deal was regarding his beef with defendant DM MILLER. (THE PLAINTIFF TOOK THIS DENIAL AS BEING TIED TO HIS UNWILLINGNESS TO DROP HIS PENDING LITIGATION AGAINST ASSISTANT COMMISSIONER CHARLTON LEMON AS RECOGNIZED IT AS BEING A VIOLATION OF HIS RIGHT PURSUANT TO 42 U.S.C. § 1985(2)(3)).

On Jan 13, 2023 at 5:00pm the plaintiff informed defendants SRT #112, SRT #203 that he was again bleeding from his rectum area and was in severe pain and in need of medical care and emergency sickcall. In response he was told that SRT doesn't do sick call and that all his problems could disappear with a snap of a finger if he dropped his lawsuits like he was told to do.

On Jan 13, 2023 at 7:35pm the plaintiff was video recorded in his cell taking a shower and being naked without his consent and upon viewing of video the court will see that the plaintiff was still taking and being subjected to cold water showers which he took as a form of retaliation since there was an empty cell that he could have been moved to in cell 612.

THE PLAINTIFF DEMAND THAT THE VIDEO FOOTAGE OF HIS CELL BE PRESERVED FOR DISCOVERY REASONS ON JAN 13, 2023 FROM 7:35 - 9:00PM).

On Jan 13, 2023 at 7:55pm the plaintiff was visited by mental health staff and instead of SRT defendant that were present who name are unknown allowing the MH staff to enter to inside of the plaintiff cell which has a double door so plaintiff would still be on one side and the MH staff on another but out of ear shot of SRT where he could engage in MH counseling. MH staff was told that she had to speak to plaintiff through door while she was in the hallway with SRT and they were listening to plaintiff mental health session. (PLEAINTIFF UNDERSTOOD THIS TO BE A VIOLATION OF HIS AMERICAN DISABILITIES ACT RIGHTS AND A FORM OF RETALIATION PREVENTING HIM FROM DISCLOSING WHAT WAS TAKING PLACE IN THIS MATTER)

On Jan 14, 2023 at approximately 10:10am the plaintiff requested sickcall to SRT Captain #4 informing him that he needed a refill of his medication "DOCUSATE SODIUM" in efforts to soften his stool and stop the bleeding that was occurring with his body. As a response SRT Capt #4 stated to the plaintiff that SRT doesn't do sick call and that the plaintiff needed to call 614#. The plaintiff explained that his tablet and pin doesn't allow him to do such which SRT #4 stated well I guess you will bleed to death then because SRT do not have doctors and nurses.

After the discussion mentioned above SRT #4 then informed the plaintiff that he did have mail listing (1) piece coming from the DOJ in Washington D.C., (2) a second piece coming from the Law Department of New York City, (3) a third piece coming from the Southern District Court in New York City, but informed the plaintiff that his mail was not going to be delivered to him until he told Defendant DW MILLER whatever it was that he wanted to hear.

On Jan 14, 2023 at 10:35am the plaintiff asked to go to the law library cell in cell 510 and prepared to be rear cuffed to move to that cell. When the plaintiff door was open he was informed that being cuffed to moved within the housing unit was not policy and if that was taking place then those SRT members had their own agenda for doing such. This allowed the plaintiff to reach the conclusion that being cuffed to go to law librray cell and to see medical when is was allowed to do so was being done as a form of retaliation and deterrent due to the litigation against DOC and CI (THE PLAINTIFF DEMAND THE CELL FOOTAGE AND HAND HELD CAMERA FOOTAGE FROM THIS DATE AND TIME TO BE PERSVED FOR EVIDENTRY REASONS)

On Jan 15, 2023 Investigators from the New York City Correction Investigation Division came to speak with the plaintiff in regards to the incident that took place on Jan 7, 2023 descibed herein. At 5:10pm defendnat SRT 120 and 82 attempted to prevent the investigation division officers from speaking to the plaintiff in a confidnetial manner until ~~investig~~ investigators brought such up to defendnats capatins. THE PLAINTIFF UNDERSTOOD THIS AS A WAY OF DEFENDNATS ATTEMPTS AT PREVENTING THE PLAINTIFF FROM DISLCOSING WHAT VIOLATION OF HIS RIGHTS WERE TAKING PLACE BECAUSE HE WOULD HAVE NOT BEEN ABLE TO DO SO WITH SRT DEFENDNATS LISTENING , WHIHC IS CONSISTANT WITH THE VIOLATION MENTIONED HEREIN PURSUNAT TO U.S.C. 42 § 1985(2)(3).

COMPLAINT IN REGARDS TO VIOLATIONS THAT  
OCCURRED AT G.R.V.C. FROM JAN 16, 2023 - , PRESENT

On Jan 16, 2023 the plaintiff was tranferred back to GRVC facility and was houswed in a housing unit 1a, without his carry medication and astma pupm.

J. On Jan 17, 2023 the plaintiff still did not have his property and at approxamatley 10:30am began having a asthma attack and notified defendnat CO Mardemn sheild 13770 of such who smiled and stated to the plaintiff WELCOME BACK TO GRVC and walked away.

. On Jan 17, 2023 defendant Assistant Commisioner THOMAS GRIFFN toured housing unit 1a with defendant Warden Katherin Cort and stopped in fron tof plaintiff cell whihc was cell 13 and asked the plaintiff "IF HE WAS READY TO DROP THE SUIT WITH LEMON", the plaintiff was shokc and did not respond but over heard this defendant walk way saying I will break him like I did so many like him when I worked in GreenHaven.

The plaintiff cell was subsequently moved from 13 - 11 due to maitinace issues and once moved to cell 11 on jan 17, 2023 afternoon the plaintiff was given his bag by securirty officer Andrew Hickson who came to ceel 11 opened the plaintiff cell and smile saying welcome back. This officer is named in cases involing the plaintiff in ALEXANDER WILLIAMS V. CITY ET AL, 21-CV-1083 (PGG)(KHP) , ALEXANDER WILLIAMS V. CITY OF NEW YORK ET AL, 22-CV-3819 (PGG)(KHP) AND AALEXANDER WILLIAMS V. CITY OF NEW YORK ETA L 22-CV-10537(UA), the plaintiff is not naming the officer Andrew Hickson in this case because he can not definitely state that CO Hickson is the cause of the missing property he discovered was no longer in his bag.

When the plaintiff serach his bags wfter securirty officer Andrew Hickson gave it to him after property was not with plaintiff for two days the plaintiff became aware that his TORA and Jewish Letirture was misssing along with legal papers concerning on-going legal matters and all of his medication inclduing two athsma pumps. The plaintiif was told by officer Andrew Hickson that the property had to be search before itr was given

to him but knows that in the past the facility as an whole has instituted a custodial policy of not allowing court order lockdown inmates to have Tora's or Korans and issuing ~~bibles~~ bibles in replacement. In fact after thoroughly inspecting his property the plaintiff saw that that was the case and he filed a grievance on the matter. *Complaint Filed see EXHIBIT - 42*

The plaintiff was not fed kosher trays on Jan 16, lunch and dinner and on Jan 17, 2023 breakfast lunch and dinner. And instead was fed Cold food, and told that housing unit 1a doesn't not have food warmers because we were not inspecting you guys to come back to the jail. As a result the ~~plaintiff~~ did not eat at all.

On Jan 17, 2023 the was subjected to his cell light being on all morning, day, afternoon and night and told that that were the orders that they were given in regards to dealing with him. The plaintiff began to suffer migraine headache from this and took it as retaliation and punishment for his litigation.

On Jan 17, 2023 when the plaintiff was allowed to take a shower he was placed in Enhanced restraint and cuff even though he has a cane and medical documentation that state otherwise. Defendant Marden stated to plaintiff when placing him in the shower that his assistant commissioner ~~the plaintiff when placing him in the shower that his assistant commissioner~~

gave him orders and that was what he was going to follow. The plaintiff took this as defendant MARDEN speaking in regards to something defendant THOMAS GRIFFIN informed him or ordered him to specifically do in regards to the plaintiff.

While in the shower a captain TAYLOR left the housing unit and went over to HEARING DEPARTMENT which is ten feet from housing unit 1a and checked the plaintiff hearing and institutional records. He informed the plaintiff that he is none of the classifications of CPATYAIN ESCORT, RED I.D. OR ENHANCED RESTRAINT as the facility was informing staff that the was and sent an email out to the O.S.I.U department seeking guidance moving

forward.

On Jan 17, 2023 the plaintiff was unable to pray and read from the TORA because it was confiscated and he was not given a voucher and/or a reason why. Nor was he explained why property was searched in his presence.

On Jan 18, 2023 at approximately 5:30 - 6:30am ~~xxx~~the plaintiff was fed a tray that was freezing cold by defendant MARDEN and was not kosher, when the plaintiff explained to defendant MARDEN that he was Jewish and needed a kosher tray the plaintiff was told by MARDEN that he was no Jew and that as a Army soldier he didn't believe in Jews being in jail. NOTE: THAT THIS IS A MATTER THAT WAS ALREADY DISCUSSED WITHIN THE FACILITY AND THE FACILITY WAS PLACED ON NOTICE THAT THE PLAINTIFF WAS HAVING ISSUES RECEIVING KOSHER TRAYS SINCE HE WAS A JEWISH INMATE SINCE ENTRY OF NYC DEP'T OF CORR IN MARCH 20-18.

At approximately 9:20am on Jan 18, 2023 plaintiff informed defendant MARDEN that he was having ~~xxx~~issues breathing and was suffering from an asthma attack, defendant MARDEN ~~xxxx~~informed plaintiff that there was nothing wrong with him but stated that he was going to cover his ass by logging in housing unit logbook that he had called medical emergency at 9:20am and another officer by the name of BROS was present to witness this. At 9:53am the plaintiff asked again stating that he was wheezing and in chest pains and was informed by defendant MARDEN that he was told by ADW Tindle not to give the plaintiff shit if a captain was not present on housing unit. The plaintiff was never afforded medical attention and used a clear plastic bag property was in to assist in getting breathing under control. See EXHIBIT - 41,

On Jan 17, 2023 at approximately 7:30am the plaintiff was awake and on his door speaking to defendant KATHERIN CORT who is the warden of GRVC, and informed her that the facility was using enhanced restraint on him when he was not that status. Defendant KATHERINE ~~CORT~~ CORT, smiled



at the plaintiff and stated YOU HEARD WHAT THE COMMISSIONER SAID TO ME ABOUT YOU, speaking in regards to the statement made by defendant THOMAS GRIFFIN on Jan 17, 2023 in regards to breaking the plaintiff over naming a separate assistant commissioner CHARLTON LEMON in a separate legal action under WILLIAMS V. CITY OF NEW YORK ET AL, 22-CV-3819.

At 12:30pm on Jan 18, 2023 the plaintiff was placed in Enhance Restarint by defendant MARDEN and walked to the facility barbershop area. This all took place on camera and the plaintiff ~~xxxx~~attest on camera that he was not this classification of enhance restarint. THE PLAINTIFF ASK THAT THE CAMER FOOTAGE BE PRESERVED FOR THIS MATTER, SO THAT GENTIC VIDEO WILL BE AVIALBE DURING DISCOVERY IN THIS MATTER.

While walking to the barbershop the plaintiff stopped ADW HARRIS and asked him why was he in enhance restarint set up if as the tour commander and admin dep of facility ADW HARRIS was aware that plaintiff was not Enhance Restarint Status.

Subsequently while in the barbershop ADW HARRIS called and spoke with a Captain Taylor and informed him that the plaintiff is not Enhance Restarint status and to no longer place mittens, waist chains or shackles on the plaintiff because of the fact that ADW HARRIS was sent an email from O.S.I.U. informing of such.

On Jan 18, 2023 during lunch time the plaintiff was fed a nonkosher meal that was cold and as a result the plaintiff did not eat .

On Jan 16, 2023 the plaintiff was not afforded (1) hour recreation and the courts have long recognized that detainees have a right to recreation where they can exercise and receive fresh air, See McERAY V. LEE 963 F.3d 110, 117 (2d Cir. 2020) QUOTING ADERSON V. COUGHLIN, 757 F.2d 33. 34-35. With the plaintiff being unlawfully subjected to 23 lockdown after the opasing of the HUMANE ALTERNATIVE TO LONG-TERM solitary confinement act, the (1) hour a day for recreation is the only day that the plaintiff



is provided fresh air and sunlight.

THE PLAINTIFF DOES WANT TO STATE A EQUAL PROTECTION RIGHT VIOLATION WHEREAS AS WHEN IN WEST FACILITY FROM DEC 2, 2022 - JAN 16, 2023 THE PLAINTIFF AND ALL COURT ORDER LODCKDOWN INATE HAD TV'S IN THIER CELL AND NOW THAT THE PLAINTIFF IS BACK IN GRVC HE IS SUBJECTED TO NO TEVLIVIISON IN CEEL 23 OR 24 HOURS DAY WITH COMMUNICATION OR TV WHILE OTHER COURT OIRDER INMATE WHO RESIDE AT WEST FACILITY HAVE TV IN CELL.

On Jan 18, 2023 at approx 12:35pm whne the plaintiff was placed ~~in Enhance~~ in Enhance Restraint Set Up by defendant CO MARDEN, he reiterated that he was doing what he was informed to do by defendnat PRESTON RITTER, who is security staff at the facility. It is important to note that defendant PRESTON RITTER as a security officer knowns the plaintiff status is not enhance restraint but purposely mislead defendant MARDEN as a form of retaliation against the plaintiff out of the fact that he is named in two seperate suits in regards of action and conduct that he enaged in against the plaintiff and other inmates that were on court order lodckdown status. These case are as followed, ALEXANDER WILLIAMS JR V. CITYY ET AL, 21-CV-1083, JOHMANNI ANDUZE V. CITY ET AL, 2022 U.S. DIST LEXIS 140929 AND FLORES V. CITY ET AL, 2022 U.S. DIST LEXIS 140941 and that he was found to had acted in retaliati in eah case.

On Jan 19, 2023 at approxametly 8:45am defendnat KATHERINE CORT toured plaintiff housing unit and informed plaintiff that he was correct that he was noit suppose to be hand cuff unless he was leaving the building and that she informed the correctional staff throughout the facility. This admission by the warden supports the plaintiff claims of Due Process violation and retaliation since the issues had already been visited under previous administartion of Warden Jean Renee.

On Jan 19, 2023 at approximately 9:45am defendnat capatin Jospeh

entered the plaintiff housing unit to afford the plaintiff a shower and ordered a Officer to use enhance restraint set up on the plaintiff to go to the shower. When the plaintiff attempted to inform defendnat Captin JOSEPH that he was not enahcne restarint status defendnat TOLD KAPATIN JOSPEH told plaintiff to shut up and turn around. THIS WAS DESPITE THE FACT THAT A CAPTIN GENTRY HAD ALREADY MADE A NOTATION IN LOG BOOK ON PAGE 76 OF 1A LOGBOOK INFORMING THATTHE PLAINTIFF AND ANOTHER INMATE BY THE NAME OF FRANCIS WERE ONLY TO BE CUFFED WHNE LEAVING THE FACILITY.

On Jan 19, 2023 the plaintiff was not afforded kosher meal fro breakfast lunch and diner.

ON Jan 19, 2023 the plaintiff was not afforded (1) hour recreation and was usbjected to <sup>24</sup>~~24~~ hours locked in a cell which was contempt of JLO and inhumane as well as deliberate done so by defendnat named herein this complaint.

In displaying the issue and in support of exhibiting to the court the obvious Due Process violation of the plaintiff's rights in regards to being unlawfully placed in Enhance Restaints the plaintiff present Exhibit <sup>35</sup>~~35~~ which is informing and etailing that the plaintiff is to be placed in Enhance Restarint to and from every single program, and then Exhibit-36 which clearly states that the plaintiff is only to be placed in Enhance Restaint set up when leaving out side of the facility. The plaintiff attest that Exhibit I is a custom, police, practice, usgae of the Defendnat City and other named and not bamed herein this complaint.

On Jan 20, 2023 the plaintiff awoke to a housing unit search by SRT, while search was getting conducted the plaintiff can be seen asking Defendnat SRT 117 where is the video camera and/or body camera so that they can ensure that the condcut ddsplayed durring the search is properly Memorialized. SRT 117 ensured the plaintiff that the search was on the up and up. Defendnat SRT 78 ENTERS PLAINTIFF CELL of cell 11 on housing

1a and began reading plaintiff legal papers in search of what plaintiff took to be particular documentation. Once paperwork was located the plaintiff saw that SRT 78 DID SEIZE a motion of objecting and a recently obtained legal documentation in the matter of ALEXANDER WILLIAMS JR V. CITY ET AL, 21-CV-1083 (PGG)(KHP) where the plaintiff was working on an objection to defense counsel request for an STAY in the matter. Defendant SRT 78 placed the legal documents of the plaintiff inside a orange DOC issue jacket that the plaintiff was issued for recreation and placed both inside of a plastic bag and walked out of the plaintiff cell stating; "FUCK YOUR LAWSUITS AND THE COURT SRT RUNS THIS ". The plaintiff was never issued a reason why his legal documentation was seized, was never given a voucher or receipt and took defendant SRT 78 comment as being tied to retaliation and violation of the plaintiff First Amendment rights, as well as Conspiracy to violate one's civil right pursuant to 42 U.S.C. §1985(2)(3). Defendant SRT 117, was heard by the plaintiff telling Defendant SRT 78 that he did not want to be apart of that and next time do not involve him in that Bullshit. The plaintiff attest that Defendant SRT 117, violated the plaintiff rights pursuant to 42 U.S.C. § 1986 FOR failing to prevent violation of the plaintiff constitutional rights at that time. (Grievance was filed)

On Jan 20, 2023 the plaintiff was not afforded recreation and when he asked defendant CO BAWA SHILD NO 1812 about recreation the plaintiff was informed ~~xxxx~~by defendant BAWA that he would not be getting recreation because he was Ordered by defendant WARDEN CORT to make sure that I was on the burn and dead of all services. defendant BAWA then issued a mental Health Referral later seeing that the plaintiff became depressed and distance in nature.

NOTE: PLAINTIFF DEMAND THAT THE FOOTAGE FROM HOUSING UNIT 1A ON JAN 20, 2023 SRT SEARCH AT APPROX 8:00AM -10:30AM BE PRESERVED FOR EVIDENTRY PURPOSES

On Jan 20, 2023 again the plaintiff was not afforded a kosher meal in pursuant to his religious dietary and therefore did not eat for the entire day, nor was he given a reason the was tied to a legitimate penological purpose of denial of his Kosher meal. During lunch feeding time on Jan 20, 2023 defendant BAWA, when asked for his Kosher tray/meal was told by defendant BAWA, 'YOU ARE NOT JEWISH THE FACILITY CARD DOESNT SAY IT AND I WAS TOLD TO FEED YOU REGULAR TRAY", the housing unit logbook would support that no Kosher meals was sent to housing unit for the plaintiff.

On Jan 20, 2023 the plaintiff while working in law library cell 1 of housing unit 1a requested to use the bathroom from Defendant BAWA and was denied the right to do so but given a plastic garbage bag and told to use this for bathroom this could be seen on camera when the plaintiff exits law library cell at 3:16pm on that date.(THE PLAINTIFF DEMAND THE PERSERVATION OF THIS FOOTAGE FROM HOUSING UNIT 1A ON JAN 20, 2023 AT THIS TIME FOR EVIDENTRY PURPOSES)

Agin for a second time on Jan 20, 2023 the plaintiff can be seen on housing unit gentic footage using a bag to use the bathroom whenever in law libaray cell 1 as a custom, practice, policy procedure or rule of GRVC, DOC and defendnat CITY, at 06:45pm. (PLAINTIFF DEMAND THAT HOSUING UNIT 1A FOOTAGE AT THAT TIME BE PERSVED FOR DISOCVERY REASONS).

On Jan 20,2023 at approximately 9:15pm Defendant Capt RIVERA sheild 1230, stopped at the plaintiff cell door that he was the "REASON" that I was now calssified as Enhace Restarint Status, that he did not care about what defendnat WARDEN CORT, said in regards to the facility wide memorandum that the plaintiff was not ERS (Enhance Restarint Status) because he had just as much time as she did and that everytime that plaintiff came out of hhis cell he would be cuffed. By Defendnat's CAPT RIVERA, own words he is clearly knowlegdable that his action s violates the plaintiff's

due process rights covered by the FOURTEENTH AMENDMENT, as well as supporting evidence that defendant WARDEN CORT failure to supervise and otherwise discipline officer, captains alike under her command for their wrongful conduct.

1. On the morning of Jan 21, 2023 the plaintiff asked to go to cell one which was designed for in-house law library for his housing unit. Defendant CAPTAIN RIVERA SHEILD 1230, ordered the plaintiff rear cuffed even though he is aware that the plaintiff possess a cane and had the plaintiff placed in cell one further giving instruction that the plaintiff is to use a facility garbage bag to use the bathroom if/when needed. Once the door was closed defendant CAPTAIN RIVERA SHEILD 1230, informed the plaintiff stating "YOU WILL BE SURPRISED WHAT I AM CAPABLE OF DOING WITH CART BLANKET, I WAS TOLD TO BREAK YOU AND THAT I COULD HAVE THE DEPUTY WARDEN POSITION AT ANY FACILITY I WANT SINCE I PASSED THE CLASS AND I AM PLANNING TO DO JUST THAT "MR WILLIAMS" NOW ENJOY YOURSELF WITH THE LAW LIBRARY, BY THE WAY DID YOU GET YOUR LEGAL WORK BACK FROM SRT?. This comment informed the plaintiff that defendant CAPTAIN RIVERA SHEILD 12230, was not only aware of the fact that defendant SRT 78 seized the plaintiff legal documentation the day before, but lead the plaintiff to believe that defendant CAPT RIVERA SHEILD 1230 conspired with defendant SRT 78 and others unknown to the plaintiff to do so in efforts of preventing the plaintiff litigation, which is pursuant to the claim brought herein 42 U.S.C. § 1985(2)(3).

Plaintiff ALEXANDER WILLIAMS JR. used the bathroom inside of cell 1 using clear plastic bag all day and can be seen exiting with bag of urination on Jan 21, 2023 at approximately \_\_: \_\_pm. ( PLAINTIFF DEMAND THAT GENTICK FOOTAGE FROM 1A UNIT BE PRESERVED DISPLAYING THIS FOR EVIDENTIARY REASONS)



1. At 12:15pm the plaintiff informed defendant CAPT RIVERA SHEILD 1230 that he was bleeding bad in his return area and needed medical emergency to which capt RIVERA SHEILD 1230, stated to plaintiff that pursuant to facility policies for his housing unit that the plaintiff was not allowed to be seen by medical staff in clinic area of the facility.

2. The plaintiff again asked defendant CAPT RIVERA SHEILD 1230 at 3:45pm if he could please be taken to see a doctor for a medical emergency because he was in severe pain and bleeding to which defendant CAPT RIVERA 1230 stated to plaintiff to stop asking him for medical because it was not going to happen. ( THE PLAINTIFF DEMAND PRESERVATION OF OUTSIDE OF CELL 1 ON HOUSING UNIT 1A ON 3:45PM ON JAN 21, 2023 SHOWING DEFENDANT CAPT RIVERA 1230 STANDING IN FRONT OF DOOR WHILE PLAINTIFF ON GROUND IN PAIN)

3. On Jan 21, 2023 at approximately 4:55pm defendant CAP RIVERA SHEILD 1230 was present on housing unit for dinner feeding where plaintiff expressed to him that he hadn't eaten all day because facility did not provide a Kosher meal pursuant to his religious Kosher diet to which defendant CAPT RIVERA SHIELD 1230 responded telling the plaintiff that court order inmate per facility command level order / policy was not Jewish muslim, vegetarian, anything other than christian so that it didn't matter what they eat. Plaintiff argued that this was wrong and being done out of spite and retaliation to which defendant CAPT RIVERA SHIELD 1230 stated you finally starting to understand it now Mr Williams and it will all go away when you decide to dismiss your suit against LEMON, speaking about plaintiff case in the Southern District under WILLIAMS V. CITY OF NEW YORK ET AL, 22-CV-3819(PGG)(KHP).

4. On Jan 21, 2023 when the plaintiff asked defendant CAPT RIVERA 1230 for his (1) hour recreation session he was told the same thing that Defendant MARDEN informed him which was that he was told by defendant CORT

that the plaintiff specifically was on "RECREATION RESTRICTION" indefinite until further notice. The plaintiff attest to both defendant MARDEN on Jan 18, 2023 and CAPT RIVERA 1230 on ~~Ajnxix~~ JAN 21, 2023 that he did not receive a ticket/misbehavior infraction where recreation restriction was given at the conclusion of a hearing, that he did not receive and ~~no~~ "NOTICE" that he was restricted from recreation and that restricting him from recreation without the two was violation of his DUE PROCESS rights. As a response defendant CAPT RIVERA 1230 stated " I DO NOT CARE ABOUT THE LEGAL JAILHOUSE LAWYER SHIT YOU KNOW WHAT EVERYONE WANTS AND EXPECTS FROM YOU SO THE SOONER THAT THE LAWSUIT IS DISMISSED THE SOONER YOUR DUE PROCESS RIGHT WILL BE RESPECTED".

11" IS SPECIAL NOTICE

The plaintiff would like to attached this and the religion burden to the cause of action of (1) DUE PROCESS VIOLATION & (2) CUSTOM POLICY UNDER THE MUNICIPAL OF DEFENDANT CITY using EXHIBIT-31 as support showing that defendant CITY and other named and unnamed herein has been using a custom, practice, policy, procedure or rule of defendant CITY to place Substantial Burdens of COURT ORDER inmates Religion as well as denial of (1) hour recreation as stated in Supreme Court Orders without reason or "NOTICE", where a well known respected civil attorney in TRACIE A SUNDACK LLP filed suit in the matter of a KWAIN THOMPSON who is a court order lockdown inmate the like of the plaintiff AL;EXANDER WILLIAMS JR, Plaintiff also attaches EXHIBIT-35 as copies of grievance showing that such is a normal practice that been going on for time now.

On Jan 22, 2023 the plaintiff asked CO ~~LOPEZ~~ <sup>DeJesus</sup> shield 6035, if he could get his (1) hour recreation and was told that the plaintiff is on recreation restriction and that he would not receive rec but the rest of the inmates would. After hearing the plaintiff out CO LOPEZ went into unit bubble station to locate any documentation supporting the plaintiff restriction



and return to inform the plaintiff that the officer in the bubble a CO BLANCIE informed him "CO LOPEZ" that the warden of the facility GRVC informed her personally that the plaintiff was not allowed to recreation ever period.

\_\_\_\_. This was the fourth times that the plaintiff was informed something of this nature when regarding his recreation session that is mandatory if properly following supreme court lockdown order, and without "NOTICE", or a "HEARING" concluding recreation restriction as a finding for deprivation of mandorty service/right per court order the plaintiff attest that he had his (1) DUE PROCESS RIGHTS violated by defendant named herein; (2) was subjected to a CUSTOM PRACTICE, POLICY, PROCEDURE, OR RULE of Defendant CITY pointing to EXHIBIT-37 as support along with EXHIBIT-38 *see*

\_\_\_\_. On Jan 21, 22, 2023 the plaintiff was not afforded his kosher meal in pursuant to his religious deiatry , understanding that missing a few days of kosher meals might night arise to a consitutional violation, but at this point it was obvious that the defendants had placed a substaintail burden on the plaintiff enteir religious freedom whihc included his kosher meal and did so without notice which would include a DUE PROCESS violation pursuant to the CAUSE of ACTION stated herein this complaint, and that the defendnat CITY, WQARDEN CORT, JEAN RENEE, TIFFANY MORALES, JOANNA MATOS, LISA BARNBY, JONELL SHVRAJ and others unnamed created a polciy as seen herein EXHIBIT-34 making such a BURDEN an officla polciy.

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\_\_\_\_. On jan 22, 2023 the plaintif was subjected to using a clear garbage to use the bathrrom while in cell 1 a cell used for typing and legal studies as seen on footage exiting with bag of urination at 6 : 40pm(. PLAINTIFF DEMAND THAT THE DEFENDANT PERSEV FOOTAGE OF HOUSING ~~EXUNIT~~ AT THIS TIME AND DATE FOR EVDIENCE AND DISCOVERY IN THIS ACTION: ) IN support to establish that such was yet another custom, polciy, practice, usage, procedure or rule , of Defendnat CITY.

ON Jan 22, 2023 at approximately 6:30pm the plaintiff can /will be seen on grvc gentie footgae exitiung cell 1 escorted by Defendant CAPTAIN GUAN sheild 367 handcuffed and carrying plastic bag of urination where he was sunbjected toi using the bathroom in such manner as punishment and oither inmates who use cell 1 law library was not. Furthermore the plaintiff was then e escorted by Defendnat CAPATIN GUAN sheild 367 to the shower hband cuffed. When the plaintiff attested he was told by defendnat CAPATIN GAUN " I DO NOT CARE WHAT YOUR PAPER WORK SAY i AM CUFFING YOU AND VIOLATING YOU UNTIL ADW HARRIS TELLS ME THAT YOU DISMMISED LAWSUIT LIKE THEY WANT".clearly acknowldgeing the fact that the plaintiff was not supposed to be transported in said manner but was doing so pushing an agenda that was in violation of the Plaintiff ALEXAANDER WILLIAMS JR Constitutional Rights.

On Jan 23, 2023 at approximately 10:40am the plaintiff was able to aghain speka with defendant WARDEN CORT who was touring the housing unit with other ADW's and showed her the AFFIDAVIT from the securirty captin ERICA GAINOUS and inform the warden that this captain instituted a facility wide seperation on him on matters that the plaintiff allegely thgreeten the life of her kids and family members. Plaintiff expressedd that this CAPATIN Erica GAINOIUS had numerous officers in the pass violate his rights and become aggressive with him and that the seperation that is known in DOC should be honored. In response defendnat COURT stated to the plaintiff that he isnt seperating from GRVC until his suit against LEMON is no longer an factor and she did not care about his Recreation Restriction and conditions of his housing unit, leaving this defendant unable to argue 'PERSONAL INVOLVEMEN " as an affimitive defense. See EXHIBIT-34 for copy of affidavit submitted to the court by securirty capatin Erica Gainous.

ATapproximately 1:20 pm on Jan 23, 2023 the defendnat THOMAS GRIFFIN was present on the plaintiff fhgousing unity and the plaintiff spoek with him from cell 1 law library cell where the defendnat stated to the plaintiff " YOU DO NOT NED A TV YOU DO NOT NEED A CANE YOU ARE ON PUNITIVE LOCKDWON

UNTIL WE KNOW FROM THE COURTS WHATS GOING ON WITH SUITS", . The plaintiff took this as the defendnat THOMAS GRIFFIN engaging in the saem retaliatory conduct that many other defendants named herein engaged in along with the defnedant THOMAS GRIFFIN openingly admitting that DOC in in violation AMERICAN DISABILITIES ACT , named hereinwhere DOC maintains a custom, practice, polciy rule or procedure of taking plaintiff walking cane whihc he needs to walk and making him hop and jump around the housing unit when neded to go to shower or law library cell , when EXHIBIT-~~HO~~ herein does not state any restrion or limitation on posession of walking cane nor odes defendnat CITY or DOC have a written policy of limitation on medical devices issued by medical staff and cotors.

On Jan 23, 2023 at approxamately 2:45pm when returning from medical the defendnat HO sheild number 17626 took the plaintiff walking cane when he got to housing unit door even though there are no othe rinmates out of the unit floor and ordered plaintiff ti limp around . defendnat HO stated that he did not caare of the plaintiff painnor did he care about the plaintiff's complaints because he was close to retirment and nothing would happened to him for violating plaintiff Rights.. Permit for plaintiff cane could be sen herein as EXHIBIT-~~HO~~.

On Jan 23., 2023 at approxantely 3:35pm - 3:55pm the plaintiff was let out his cell to go to 11 cell to retrive paperwork and go back to law library cell 1 without being allowed to use his cane and as a resultwas subjected to hopping up the stairs and back down, by defendnat HO.

On Jan 25, 2023 the plaintiff was subjected to urinating in clear plastic bag whenever utilizing cell one law library and that plaintiff could be seen exiting cell one at 07:37pm with bag of urination as this was custom, polciy, practice, procedure or rule of defendnat CITY and others. ( THE PLAINTIFF DEMAND PERSVATION OF GENTIC FOOTAGE FROM HOUSING UNIT ON THIS DATE AND TIME FOR DISCOVERY PURSPOES)

On Jan 23 2023 and Jan 24, 2023 the plaintiff again was not afforded a Kosher meal leaving him with nothing to eat and without notification as to why he was being restricted from his Kosher meal pursuant to his Jewish Religion.

On Jan 26, 2023 the plaintiff was prescribed antifungal medication due to catching fungus from the shower area in housing unit 1a not being properly sanitized. The Court should be informed that 311 and the facility GRVC Grievance office received grievances from the seven inmates that were housed in 1a and yet the unit was never sanitized as per defendant CITY and ~~XXXX~~DOC policy maintains.

On Jan 25 and Jan 26, 2023 the plaintiff again was restricted from his Kosher diet and was not given notification as to why or afforded a hearing where he could present evidence in his defense.

149. On Jan 26, 2023 the defendants CITY failed to produce the plaintiff to Bellvue hospital again for surgery leaving the plaintiff to stay in constant pain and bleeding from rectum area where surgery was for hemorrhoid removal. NOTE: THAT THIS IS DEFENDANTS 2nd TIMES IN SUCH DENIAL AND SEPARATE MATTER DENIAL TO SURGERY APPOINTMENTS LEAD TO THE PLAINTIFF'S CLOSE DEATH EXPERIENCE WHERE GALLBLADDER NEARLY EXPLODED. SEE ALEXANDER WILLIAMS JR V. CITY OF NEW YORK ET AL, 22-CV-3819(PGG)(KHP). Plaintiff ALEXANDER WILLIAMS JR, asserts this medical denial to the Custom policy for court order lockdown inmates that are barred from the facility clinic area showed in policy 13/21 seen herein as EXHIBIT-~~33~~ 34.

150. On Jan 27, 2023 the plaintiff was asking to take a shower but was placed on hold due to inmate Kwaine Thompson explaining to Defendant CAPT PALMERO and CO RODRIGUEZ that there was a department wide list in housing unit bubble station that informed who in housing unit was mandated to hand-cuffing ERS and who was not. BOTH defendant left unit to go and look at document which is also seen herein as EXHIBIT-36.



Directly after reviewing this documentation in 1a bubble station defendant's CAPT PALMERO sheild 1888 , CO RODRIGUEZ sheild 9067 and CO WOLOSKI came to plaintiff's cell and placed him in ERS set up disregarding the informtion circulated by facility officials seen herein EXHIBIT-36 and escorted the plaintiff to shower. When plaintiff explaiened the information displayed in EXHIBIT-36 that he isnt one of the ERS inmates in housg unit this was disreagrdd on Jan 27, 2023 approxamately 8:30am - 9:30am . The plaintiff conscured this as relaitory conduct like that of the other defendants mentioned herein due to the fact that defendant CO WOLOSKI was present days ealier with another capatin and was informed by that captain who in housing unit was supposed to be cuffed ERS and who wasnt and that the plaintiff was one of the inmates that wasnt. As a result of this incicdent the plaintiff became MANICALLY depressed that lead to facility medical staff placing him on a 24/7 suicide watch that started on JAN 27, 2023 and ended on ~~Jan~~ <sup>FEB</sup> 3, 2023 . STATING THAT THE BLAKET USE OF ERS SET UP AT GRVC WAS A CUSTOIM, POLCIY, USAGE, PRACTICE, PROCDURE AND RULE OF DEFENDNAT ICITY.

On Jan 30, 2023 the plaintiff was subjected to having to urinate and deficate inside of clear garbage bag while using unit law library. PLAINTIFF DEMAND THE PERSERVATION OF UNIT 1A FOOTAGE AT ~~8~~ <sup>10</sup> : ~~00~~ PM ON JAN 30, 2023 DISPLAYING HIM COMING OUT WITH CLEAR BAG OF BODY FLUIDS.

On Jan 30, 2023 the plaintiff requested to have his own tv placed in front of huis cell like that of RICKY TORESS in cell 7 and the other inmates in cells 2 - 5 . When plaintiff was denied he understood that denial was tied to retalitory and punishable conduct because of his civil litigation and that his confienment to cell 11 on court order was punitive in nature.

On Jan 31, 2023 the plaintiff was subjected to using the bathroom again in a plastic bag displaying the CUSTOM polciy, practice usgae that is being maintain and Gentice cameras could catch the plaintiff exiting cell 1 on housing unit 1a with clear bag of urination on said date at approximately 06:00pm. THE PLAINTIFF ASK THAT FOOTAGE BE PERSEVED FOR DISCOVERY REASON.

Also on Jan 29, 30, and 31 2023 the plaintiff was not afforded a kosher tray but other inmate that was jewish did, this included matzah creackers and grape juice.

VIOLATION OF PLAINTIFF'S RIGHTS AS IT  
RELATES TO DEFENDANT'S CITY POLICY ON  
ON CONDUCTING (1) HOUR REC FOR COURT  
ORDERED LOCK DOWN INMATE CLASSIFICATION

The plaintiff attest that on all of the days excluding the ones listed herein that he was not afforded (1) hour recreation that he was subjected to being placed in an enhanced restraint set up such as waist chains, handcuffs and mitts for the entire hour in which he was afforded recreation.

This is a policy that is a custom usage, policy, practice of the DEFENDANT CITY as seen pg 5 of EX-A herein, this policy was also already found to be in violation of the rights to inmate in Court order Classification by Magistrate Judge Katherine H. Parker in the matter of ALEXANDER WILLIAMS JR VS. CITY (KHP) REPORT AND RECOMMENDATION DATED AUGUST 05, 2022, 21-CV-1083 PG 51-56 ~~XXXXXX~~ See EX-11 herein.

The policy that is currently in place is a mirror image of the policy that was found to be in violation which was Command level order 370.20 and could be seen here in as EX-12 to be compared to EX-A herein.

The defendant CITY was a defendant named in the matter of Williams Vs City Of NEW YORK 21-cv-1083 and as of being name in that matter and receiving the Report and Recommendation in that matter, the plaintiff position is that the defendant CITY was notified and should have known to allow the exact same Policy to be used, enforced against the plaintiff and others that are classified as being Court Order Lockdown inmates within the entire DOC.

For this matter the plaintiff names the following people as being defendant herein this matter for the creation and endorsement of EX-A

WARDEN JEAN RENE, JONELLE SHIVRAJ, LISA BARNABY, JOANNE MATOS AND TIFFANY MORALLES.



There is no difference in the wording or any changes made between CLO 370.20 and CLO 13/21 in which the defendant CITY can be used as a defense in the matter of violating the plaintiff's rights as it relates to recreation and the right to exercise and not being placed in such restraints during his recalcitrant time period.

There is no legitimate Government interest in this matter that can support the reason why the plaintiff would need to be placed in such restraints when he is being recalcitrant only and is the only person in the recreation pen in the entire recreation yard during the (1) hour in which he is afforded recreation.

It is the plaintiff's belief that he was and is being treated in such manner as not only knowingly and willingly violating his Rights but as a form of Retaliation. This belief is taken because of when it is viewed in the totality to the treatment that he received from the defendant named herein it is obvious that they knew or should have known that using such set up for the plaintiff during recreation periods were indeed wrong and improper.

Courts in the second circuit have recognized that some opportunity for exercise must be afforded to inmates in matters of MCCRAY V.S LEE 963 F.3d 110, 117, (2d Cir 2020).

The Court has also stated that the requiring of Enhanced restraints during the period of recreation deprives a person of a meaningful opportunity to exercise and that such a Law is clearly established, See EDWARDS V. QUIROS 986 F.3d 187, 192 (2d Cir 2021).

IN THE INSTANT MATTER THE PLAINTIFF ASSERTS VIOLATION OF HIS SUBSTANTIAL DUE PROCESS RIGHTS TO BE ATTACHED TO THE SECOND CAUSE OF ACTION IN VIOLATION OF DUE PROCESS.

Defendant CITY and others stated/named herein classified the plaintiff as being enhanced restraint when engaging in his (1) hour recreation when NYC DOC policy 4518R-B pages 5-10 lays out the policy for being enhance restraint status and that any inmate that has such status should be given "NOTICE OF AUTHORIZATION FOR INITIAL PLACEMENT IN ENHANCED RESTRAINT STATUS", The plaintiff was never served with such before being enhance restraint per policy seen here in as EX-A , see EX-25 - herein for copy of NYC DOC Enhance Restraint Policy.

X FURTHERMORE PG 7 OF EX-25 lays out the Due Process hearing concerning the classifying of a detainee as being Enhance Restraint Status. This is yet something else that the plaintiff was never afforded which violates his rights.

**VIOLATION IN PLAINTIFF'S LEGAL CALLS:**

The plaintiff as a detainee process and maintains the Sixth Amendment right to counsel in connection with the criminal case and pending civil cases that he has pending. This Right is also grounded in various oonstitutional rights including the right to Due Process and equal Protection, See BOURDON V. LOUGHREN, 386 F. 3d 88, 95 (2nd Cir. 2004) .

**THE** restrictions being placed on the plaintiff as a pre-trial detniance contact with his defense attorneys and civil attorney's is a Constitutional Violation because the restrictions are unreasonable burdening to the plaintiff **ALEXANDER WILLIAMS JR** opprotunity to consult with consuel and to prepare his defense.

At the times when the plaintiff was able to speak with counsel defendnats made it theire business to stand in front of his door and l,isten to his conversatin whihh is a direct violation to attorney client privilege and holds no penological intrest in the sfaty and secuoirty the facility or individuals on the outside world.

The Courts have already estblsished in PATTERSON VS. PONTE, 2017 WL 1194489, AT \*3 (S.D.N.Y. MAR. 30, 2017) THAT a pretrial detainee's Sixth Amendment rights are violated whe a prison regulation unjustifiably obstruct, infringes, unreasonable burdens or significantly interferes with his/her access to counsel.

In the instance case the plaintiff is not aklowed to call his attoirney during reasonable hours such as 212:00pm -2:00pm whihc are common lunch hours or in the evening between 5:00pm and 6:30m pm when attorneys are out of Courts.

Furthemore the fact that the defendnats CITY by way of GRVC and DOC Officials do not have a policy in regards to properly addressing this matter is eviudence of a custom, practice, polciy. procedure and or rule that is in violation with the law and the plaintiff's ALEXANDER WILLIAMS JR, constitutaional rights, especially IN THE instandce where defendnats are standing and listening to concversatoins that plaintiff is having with his attorney's when he does call.

This type/style of practice discourages the plaintiff from calling attorney's on opportunity's when he did have the chnace out of concern tha tthe practice of standing and listneing to his conversation violatres his rights and would prejudcie his defense in his criminal and civil matters.

This is also evience as mentioned herein one of the plaintiff's cuase of action that the defendndat CITY fail ed in training the defendnat who enaged in this activity of the rights of pretrail detainee, and also failed in supervising them whihc defendnat CAPATIN GANIES AND defendnat CITY- are both liable for in that instance.

There is no legal arguiement tha tthe defendants can make in regaurds to the penoligical interest of a Witness, correction staff or to prevent escape when the plaintiff is being restricted from calling numbers that were pre-appraoved by the Supreme Court Justiuce Vincet DelGuduce who ordered the Lookdwn whihc in returns gives the plaintiff a Right to enage in conversation with the people listed on the Supreme Court Order By a Suprem Court Justice demands.

The arguiement violating the plaintiff Sixth Amendment Right

must be implemented in this matter because the plaintiff asserted that he was aware and knows that his communication with his counsels are deemed private and that his lawful preparations for trial are secure against intrusion by the Government which includes the defendant CITY and the defendants names herein that are employed by the defendant CITY as correction officer for the New York City Department of Corrections. See UNITED STATES VS. ROSNER, 485 F. 2d 1213, 1224 (2d Cir. 1973) , whereas the defendant CITY by way of the New York City Court system and the State Of New York is adversity to the plaintiff ALEXANDER WILLIAMS JR in regards to the criminal matter in which he is preparing for trial in.

The defendant CITY is aware of the violation that this practice creates because they were informed by the Courts in a matter of ALEXANDER WILLIAMS JR V. CITY OF NEW YORK ET AL, 21-CV-1083 (PGG) (KHP) REPORT AND RECOMMENDATION DATED AUGUST 05, 2022, where some of the same defendant had violated the plaintiff rights in the same instance.

In addition to the matter above in which the plaintiff is named as the plaintiff in which he uses as support in this argument. The plaintiff would like to also refer this matter to the case of JOHMANNI ANDUZE V. CITY OF NEW YORK 21-CV-0519(PGG)(KHP) Where the plaintiff in the court matter established that Defendant CITY & DUNBAR who was the warden of the facility at the time did violate his rights by way of the policy CLO 370.20 as it related to being placed in Enhanced Restrictions while during (1) recreation. SEE EX-15 HERTEIN

Ex-A herein this complaint as stated before is a mirror image of CLO 370.20 which was the core of the two complaints

listed above.

This is reason where the plaintiff herein this matter instance ALEXANDER WILLIAMS JR, names the Current Warden Warden Cortz, DW LISA BARNEBY, DW TIFFANT MORALES, DWJONNEL SHIKRAJ and DW JOANNE MATOES as defendnat sherein this matter by way of signing and acknowledging the enforcement of such a polciy just as in the matter of WILLIAMS V. CITY OF NEW YORK ET AL, 8 21-CV-1083 (PGG) (KHP) AUG 5, 2022 & JOHMANNI ANDUZE V. CITY OF NEW YORK ET AL, 21-CV-0519(PGG)(KHP).

The plaintiff is and was never afforded any Due Process in order to present evidence and information as to why he should noit be restriant durring recartoion hours.

The situation/violation from the defendnats as it relates to the illegal montioring and censoring of the plaintiff legal calls reached the level of where the plaintiff had to file and request an TRO TEMPORARY RETRSINING ORDE IN THE CASE OF ALEXANDER WILLIAMS JR. V. CITY OF NEW YORK ET AL, 21-CV-1083 (PGG) (KHP)

on or about November 7 of 2022 due to the fact that the plaintiff fwas being unable to marshal his defense and consult with hjis attorneys in confideintal as madated by state and federal laws.

Futhermore another Court Order Lookdwon Innate Kwaine Thompson legal advisor had to file an affirmation amending his JLO for the Courts to order DOC and some of the same defendnats in CO ANDRW HICKSOIN, CO PRERSTON RITTER, CO KEVIN YOUNG AND CO GRAVES, to stop monitoring Kwaine Thompson phones calls as well as the defendnat CITY by way of DOC who for some reason monitors the legal calls and notify you while you on the phone with the attorney that the fecilaity if montiroidng the call.

See EX-21, for a copy of attorney Harlan Greenberg ESQ,

affirmation in regards to this issues.

This affirmation along with other exhibits listed herein supports that the monitoring of court order lockdown inmates legal calls with their attorneys' and private investigator is a custom, policy, ~~xxxxxxx~~ practice, usage, procedure and rule that defendants stated herein are enforcing that has no legitimate penological interest other than to discomfort and violate the rights of the plaintiff and others .



PLAINTIFF ARGUMENT IN REGARDS TO THE  
CONSTITUTIONAL VIOLATION OF THE 23/1  
LOCKDOWN COURT ORDER

\_\_\_ Defemdant CITY by way of DOC has mislead and failed to inform the New York City Court System of its changes within the New York City Department Of Correction in regards to Special Housing Units and LockDown Housing Units such as the one that the plaintiff fis held in.

EX-F is a copy of the plaintiff's Supreme Court Lockdown Order that explains that the Court was presented with valid information that maded the court belive that the plaintiff was soliciting the aid of other person to affect the witness(es) in his criminal case.

From Jan 2019 - Nov of 2020 the plaintiff was housed in 9 North at the Manhattan Detention Complex in a housing unit specially designed for Court Order Lockdown Inmates.

In Nov of 2020 the plaintiff was moved to GRVC to prersent time instead of being transfered to one of the many facilities on Rikers Island that are also speciallyy designed for Court Ordered LockDown inmates such as West Facility and N.I.C.

The circumstance at GRVC are beyond dire and are exactly Solitary Confienment as it relates to 23/1 Court Order Inmates, Dispolaying that the defendants CITY by way of DOC Officials are implementing added retsriotions that are not listed on the plaintiffs court order upon all Court Order Lockdown Inmates.

These Restrictions lead to the court order being enforced in a punitive manner/fashion which in returns is a violation of the plaintiffs Due Process rights as it relates to WOLFF VS McDONNELL.

The process that was used to present to so-call evidence to the court was done so ion an Ex-Parte fashion leaving the plaintiff without the opportunity to present evdience and information favorable to his defense in the matter.

Assistant District ATtorney Ernest Chin used testimony from a David Walker, this testimony that was covered by a protectvie order is seen herein as EX-N.

Is importnat to note that David Walker was vidoe recorded confessing to the murder that the plaintiff is charged with and also Audio recorded three times over.

When the courts examine EX-N you will find that on pages 40 -41 David Walker stated that he did confess to committing the murder but only after he was told to do so whihc was never established  
of  
by who ~~se~~ when.

In EX-N on pages 6 - 7 David Walker testified that he and the plaintiff ran fguns and committed various acts of crime up and down the East Coast from 1997, 1998 and 1999. This can not be true because of the fact that the plaintiff was incarcerated from 1996 - 1999 from the age of fifhtteen until he was eightteen by a a Judge for 3 years restricted placement in the New Yoprk State Divsion for Youth.

In EX-N on pages 9 - 11 David Walker testifies to committing these crime again from 1998 - 2009. But in examination of EX-0, you will find by way of a background check via White Pages Premium that David Walker was incarcerated from 2000- 2010 for arm robbery and various other violent penal law violations.

If the plaintiff was locked up from 1996-1999 and David Walkler from 2000- 2010 then it is clear that David Walker for whatever reason perjured himself and that the rest of the information that he testified to could not be deemed reliable and truthful.

This is key in the plaintiff Court Order because by law in the State of New York who ever request for any courts order such as protection orders, search warrant, arrest warrant or special ~~lock~~ Court Order for lock down is responsible for vetting the information that they use for truthfulness before presenting said information to a Judge as being reliable and credible.

In the case of the plaintiff this was not done as the Courts can see and can also examine for themselves that the person who made the testimony also admits that he did confess to the murder in which that the plaintiff is charged with.

In regards to the 23/1 Court order to address the plaintiffs communication and isolation from anyone who he can communicate with that can spread word to the outside.

It is factual that if the Defendant CITYT wanted to address such concerns that the plaintiff does not have to be subjected to such serve isolation to reach the objective agenda.

The plaintiff pin number to his phone is computerized to the point where he can only dial numbers that are programmed and listed on his Court order that go to defense attorney Julie A. Clatrk Esq, Jeffrey Chabrowe Esq, Private Investigator Kevin Hinkson and Private Investigator David Barret.

Therefore there should be no added restricted limited to the amount of times he could contact his attorney where is defendant CITY by way of DOC Officials do not have the right to determine

the amount of time per day per week or per month that the plaintiff should get to discuss legal concerns and marshal defense in any case let alone a charge ~~off~~ of murder which is the top charge that one can be charged with in the state Of New York.

Thus said added restriction being implemented is evidence of a Custom, Usage or Practice rule and procedure of the defendant CITY that has no penological interest when the plaintiff pin is already blocked to only being able to call numbers listed by the Juydge who Order the plaintiff LockDown.

Such an added restriction only makes room for exactly what is taking place whihc is to be used in an advrse fashion that can only violate the plaintiff right to communicate with his attorney a Right that is garuantueed to him by the SIXTH AMENDMENT OF THE UNITED STATES CONSTITUTION AS WELL AS THE NEW YORK STATE CONSTITUTION.

Furthermore the housing unit that the plaintif fis housed in is located in an isolated area of the facility away from all other inmate population which prevents him from any commincation with other inmates in general population. Thus 23 or 24 hours a day in a cell bears no penològical intrest if this is the case.

Agian such a restriction can only be used in a fashion adverse towards the plaintiff and retalitoryu fashion by defendnat CITY by way of DOC Officials.

Again as explain herein though not listed within his Court order seen in EX-F, the plaintiff is restricted from going to the facility clinic area as seen in the polciy herein EX-A, which also prevents him from outside commincation. When the plaintiff is moved around the facility he is so with a DOC Official escort and many of the times the DOC Official holds the rank of a Captain

or higher.

Lastly The New York City Department of Correction has recently converted the Commissary system from a paper fashion to automated which is done by way of Telephone.

The facility has failed to train the security officers who are responsible for conducting legal calls to court order inmate how to use the phone to place commissary orders for the plaintiff and others in his classification, because of the fact that they do not want to allow the plaintiff to opportunity to physically touch a phone.

Defendant CITY is liable for this failure to train and defendant CAPTAIN GANIES who holds the position as security captain and is direct supervisor over the officers who are assigned to conduct phone for failing to supervise and address the matter of the plaintiff ordering commissary.

Again this lapse and/or added restriction violates the plaintiff rights and could only be used in adverse fashion and as retaliation whenever the plaintiff doesn't do something that an DOC Officials demands.

The defendant CITY is liable for this violation as they are responsible in reporting back to the Courts with updates on the change in their policy and position as it relates to matters that are in direct conflict with the Court Order lockdown inmate classification as to allowing the Court to modify its Order to fit the capabilities of the Department of Corrections.

**MENTAL AFFECTS AND 8TH AMEND VIOLATION OF LOCKDOWN ORDER:**

Though there is no guarantee Right to Television when incarcerated in New York City DOC. The plaintiff is locked in a cell 23 hours.

aday and mant times its 24 hours a day when half of a month recreation is not afforded due to staffing issues or retaliation by defendnat named herein and others.

There is by way of the housing area the Court Order concern already being addressed and an addage of 23 hours locked in a cell has no penological intrest and only causes damgge that is unrepairable to the plaintiff.

Another example of defendnats CITY by way of DOC failed to inform the Courts that since the Covid -19 pandemic that DOC has converted to the form of using the faxphone tpo dail 614# to make a sickcall request to see doctors. See EX-P.

The plaintiff is not allowed to use the phone ~~xxx~~ do call sickcall even though its an inner departmental number whihc has lead to many days of his medical needs not being able to be addressed.

**DEFENDNAT CITY** by way of DOC has abolished all special housing unit, BOX/SHU and lock down housing areas. The Defendant CITY has not informed the Courts of this change which has lead to the plaintiff being subjected to mental abuse by way of 23 or 24 hours locked in a cell in a punitice nature by DOC officials and the defendnats named herein this complaint.

On January 25, 2013 the **NEW YORK STATE BAR ASSOCIATIONCOMMITTEE ON CIVIL RIGHTS**, PRESENTA REPORT IN regards to the effects of solitary confiuemnet in the state of New York to the House of Delegates as seen herein as EX-Q.

In that report doctors and lawyers highlighted the mental affects of solitary confienement long and short term as well as the physical damage that are both temporary and permanenet to a person being sibjected to such living condiction for long and short periods of time.

The reports also highlights that solitary confinement is Counterproductive to Human Dignity and has been Largely abandoned by the entire International Community.

The plaintiff came to being confined by the defendant CITY by way of DOC in March of 2018 and has been incarcerated every since and came with no Mental ~~history~~ Health History.

As it currently stands in May of 2022 Doctors employed by the defendant CITY at the NYC Health and Hospitals rendered a Professional Judgement stating that the plaintiff may no longer be mental fit and appears to mentally ill. See EX-R.

This is a diagnoses that the plaintiff did not have before being subjected to 23 hours locked in a cell a day without an end date.

EX-S, the court will see when a DOC staff member witness the plaintiff screaming the name of the arresting officer in his criminal case documenting that the plaintiff seemed to be slipping away from reality and suffering from depression.

EX-T shows yet another mental health referral when yet a separate DOC staff member reported that the plaintiff has been observed talking to himself. Something that he had never been reported doing before being subjected to 23 hours a day locked in a cell.

In EX-U another DOC staff member submitted a mental health referral documenting that he witness the plaintiff screaming the name Thomas Handley "YOU WILL NOT KILL ME". Another act that the plaintiff never had a history of before lockdown for so long.



In EX-W THE PLAINTIFF was observed in his cell begging and praying for his life from DOC officials by name, another fact that display that the plaintiff has been greatly affected by lock down order.

The Jurisprudence on Solitary Confinement within the Inter-American System on Human Rights has explained in depth the danger and injures that are cuasued by short and long term time spent in Solitary Confinement. ~~The~~ Inter-American Court on Human Rights has found that its elements of a prison regime and certain physical prison condictiones in themselves constitutes Cruel and Inhuman treatment, and therefore violates Artilce 5 of the Amewrican Convention on Human Rights, which recognizes the right to the integrity of the person.

This Court held that "PROLONGED" ISOLATAION AND DEPRIVATION OF COMMUNICATION ARE IN THEMSELVES CRUEL AND INHUMAN TREATMENT, HARMFUL TO THE PSYCHOLOGICAL AND MORAL INTEGRITY OF THE PERSON AND A VIOLATION OF THE RIGHT OF ANY DETAINEE TO RESPECT FOR HIS/HER INHERENT DIGNITY AS AHUMAN BEING". See VELAZQUEZ-RODRIGUEZ V. HONDRAS, INTER-AMERICAN COURT OF HUMAN RIGHTS, SERIES C, NO. 4 PARA. 156 (1998)

The Court has additionally addressed physical condictiones of detention asserting that "ISOLATION IN A SMALL CELL, WITHOUT VENTILATION OR NATURAL LIGHT,....}[AND] RESTRICTION OF VISITING RIGHTS.... CONSTITUTES FORMS OF CRUEL, INHUMAN AND DEGRADING TREATMENT".

The plaintiff asserts the following as being an injury as well.

DUE PROCESS VIOLATION:

In WOLFF V. McDONELL the courts established the need of Due Process before an inmate received punitive results such as box time and/or solitary confinement.

It is well known that New York State Rationale for the use of Solitary Confinement is to (1) Punish an Individual (2) Protect Vulnerable individuals (3) to Protect or Promote National Security and (4) To Facilitate Pre-Charge or pretrial investigations.

The plaintiff ALEXANDER WILLIAMS JR, was not and is not being afforded the Due Process rights which is rights Procedural and Substantial in nature under the Fourteenth Amendment of the United States Constitution.

EX-V is Court minutes showing that in February 13, 2022 which was only 30 days after the Lockdown Order was instituted ADA Ernest Chin informed the Courts that he and the Kings County District Attorney Office was investigating and close to bring charges against the plaintiff and other people.

Those charges never materialized and years later the plaintiff was still under that same Lockdown order.

The ~~XXXXXXXX~~ legal defense team that represented the plaintiff was able to display and present facts that supported that any/all statements and evidence placed in front of the court during Ex-Parte proceedings were false or never ended in any viable arrest of anyone including the plaintiff.

Every other inmate that was detained with the plaintiff under the Lockdown order had been recharged with a crime that was the result of them being placed on Lockdown order. These crimes were such as witness tampering, bribery, forgery, threatening witness or victim, violation of an Order of Protection etc.

The plaintiff was not and has not been charged with any other crime outside of the charges he was initially arrested on in March of 2018.

Furthermore from their investigation the plaintiff and his defense team was successful in getting charges dismissed against the plaintiff other than the Murder in 2nd degree charge.

With the understanding that the plaintiff was placed in Court order by a supreme Court Judge this Court has the Authority and Power to reassess these facts in camera and determine if the plaintiff should have been afforded more Due Process in regards to the LockDown order.

Being placed in Solitary Confinement without an End date and without being found guilty or even charged with a crime or a misbehavior infraction in support of such order is direct proof of the violation of the plaintiff Due Process.

This is especially when the DA offices have experienced a level of attrition and shortage in ADA's which have pushed the plaintiff trial back years now.

**CONCLUSION ON LEGAL ARGUMENT IN RELATIONS TO LOCKDOWN ORDER:**

In June 3rd of 2021 the President of the United States of America Joe Biden and Vice President of the United States of America Harris received a letter from multiple organization that presented evidence and facts on why there should be an end to Solitary Confinement, A copy of this letter can be read herein as EX-X.

BY WAY OF THE MEDICAL RECORDS PRESENTED AS EXHIBITS HEREIN it is clear that the plaintiff has been diagnosed with mental health illnesses that the state of New York and the federal Government

recognize as being a mental disability.

With this being the case the continuance of housing the plaintiff in any form of solitary confinement like situation is the Courts, the defendnat's CITY OF NEW YORK , and DOC Officials going against everything that the same have acknowldged as being wrong and are currently showing that by failing to properly address the mental health illness(es) of the Citienz of the United States have lead to an uptick and unprevented criminal violation that stem from the lowest to the highest criminal acts.

The defendnat' CITY violated the plaintiff's Due Process when they failed to inform the Court on their change in no longer housing inmate/pretrial detianees in a solitary fashion like manner.

The inmates that are committing rapes, stabbing againts other inmates and correctional officers are not housed in solitary confinement like manners , whne the plaintiff is and he has never been convicted of a violentx crime and evidence exist that support that he was not the person who actual committed the violent crime in whihc he is currently charged with.

the defendnat CITY also violated the plaintiff's Due Process rights and failed to properly train and supervise its Staff tyo make them understand that Court Order Lockdown Classification is not a classification that should be handled in a punitive fashioun or manner.

because of the absence of witness other then other DOC staff members , solitary confinement increases the risk of acts of torture and other cruel, inhumane and degrading treatment in a punitive fashion that the plaintiff has been experiecning.

Given its severe adverse health effects, the use of solitary confinement itself can amount to acts prohibited by art. 7 of the international covenant on civil and political rights, TORTURE AS DEFINED IN art 1 OF THE CONVENTION AGAINST TORTURE OR CRUEL, INHUMANE OR DEGRADING PUNISHMENT AS DEFINED IN ARTICLE 16 OF THE CONVENTION.

The defendant CITY is responsible for how the plaintiff and all the inmates that are in its custody are housed and receive care that are not in violation of any state and federal rights and in such a manner that does not create or exacerbate any existing injuries that one inmate/detainee may have.

In the case of the plaintiff the defendant CITY has failed in this area which has led to the filing of this complaint and others and has also showed that the plaintiff has been injured in ways that are irreparable and if treatment continues can be life ending if not addressed.

Amongst the mental injuries stated herein it is noted that the plaintiff has suffered from other medical issues such as the Removal of his Gallbladder after being misdiagnosed and untreated and not produced to medical appointments hundreds of times.

The plaintiff also suffers from a Shoulder and Wrist injury in which he has requested a second opinion and has yet to hear a response as seen in ~~EXE~~ EX-Y herein.

As a result of how the plaintiff is housed by the defendant CITY by way of DOC, all of the issues stated within the Court are can be addressed without the implementation of solitary like condition, which at this point holds no Penological Interest other

than being punitive against the plaintiff feven though he has been found guilty any any crime, any of the speculations stated within the Court order, or even a misbehavior infraction by DOC Officials that would support the unlimited confiemenet of the plaintiff fwhihc he has displayed created injuries that will never be able to heal afterwards.

As a result of the practices in which the plainfiff is housed in by the defendnats CITY , by way of DOC Officals who knowing and willing are knowledgable in the Law called "HALT" that was establsihed and passed in 2020 that ended solitary confinement.

And as aresult of these practcices, polcies and custom the plaintiff injures by Doctored employed by the New York City Health and Hospitals whihc falls under employees for the defendnat herein CITY has diagnosed the plaintiff with the following injuires:

- ANTISOCIAL PERSONALITY DISORDER
- PERSISTYSENT DEPRESSIVE DISORDER
- INSOMINA DISORDER
- NON SLEEP DISORDER WITH MENTAL COMORBIDITY
- PERSISTENT NIGHTMARE DISORDER WITH ASSOCIATED NON SLEEP DISORDER.

Placing the plaintiff on numerous drugs such as MELATONIN PO, MIRTAZAPINE PO, PRAZOSIN HCL PO.

The disorders named herein are life changging disorders what will follow the plaintiff for the rest of his life whether he is or is not convcited of the charges in whihc he is awaiting trial currently.

Other injuries assocaited with the soltatlry confinemet mentioned herein are as followed: ELEVATED ALT MESSUREMENT OF ANEMIA AND CHOLETIHIASIS WITH ACUTE CHRONIC CHOLECYSTITIS , which as lead to the removal of the plaintiff GallBladder body organ.



These inguires are the direct and proxamite result of the defendant's CITY polciy and practice that have been and are well known to be inhumane and in violation of anyone's right whihc incldues the plaintiff ALEXANDER WILLIAMS JR.

The Court Order also violates the plaintiff Fifth and Sixth Amendment Rights in a fashion that denies him/prevents/restriucts him from being able to contact other criminal defense attorneys to consult with them in regards to hiring them to add to his current defense team or to replace the defense team that he currently has.

The plaintiff has wanteds tohire new Lawyers and wanted to consult with lawyers from Esptein and Conroy Esq, Bengiman Bradford and others and has been unable to sonsult with the firms to explain what it is he may want to hire them to do in regfards to his criminal case.

The plaintiff has voiced this concerns to Attorney's from the Law Firm of PAUL, WIESS, RIFKIND, WHARTON & GARRISON LLP, who repretresent him in a seperate matter on Civil litigation , who also had a difficult time of being able to speak with the plaintiff via telephone to assist him in locating a suitable criminal deffense lawyer who he can hire to replace the current defense team that he has. (THIS CAN BE ATTEST AS FACTUAL BY ERIC ABRAMS ESQ ANN ASSOCAITE WITH PAUL AND WEISS)

THE plaintiff is also represnted by the law offices of TRACIE A. SUNDACK & ASSOCIATES, LLC, who also complains of having issues and hard time contacting or hearing from the plaintiff in regards to the matter in whihc they represent him in.

In the matter of the allageation involving Tracie A. Sundack esq the court could refere to NYC Claim No. 2022PI002930 and in the matter of the allegation involing the firm of PAUL WEISS, The Courts could reffer to 19-CV-3347, 21-CV-1083 and 22-cv-3819 in whihc they represnt the plaintiff in some fashion in each matter. See EX-13 FOR COPY OF SUPPLEMENTAL AGREEMENT ON PAUL WIESS AND EX-14 FOR LETTER FROM TRACIE SUNDACK.

WIN ALL It is the plaintiff stating that the Suprme Court Lockdown order violates his Sixth Amenmdent rights by restricting him from being able to access to the Courts and other Lawyers at all completely which is in regards to hiring new counsel to reprsent him in his legal criminal matter out of Kings County New York for the charges of Murder.

The plaintiff aserrts herein this 1983 pursuant o federal constitutional violations "PENDING STATE CLAIMS" in regards to this Soltariy confienment claim as well as the stated federal Violations.

EX-20 though not addressed directly to the plaintiff is a letter to another inmate who is housed in Court Order Lockdown housing unit purusnat to a JLO(Judical Court Order) where a lawyer from "DRNY" Disability Rights New York informed the Office of counsel for the New York City Department of Correction who is essentially for the purpsoe of this claim the same peron(s) as the defendnat stated herein CITY.®

Other case law that supports the plaintiff's claim as being housed ion 23/1 condiction as being as violation can be seen in, ALLAH V MILLING, 876 F.3d 48; BELL V. WOLFISH, 441 US 520; BELL V. WOLFISH 99 XXX S. Ct 1816; ALSO BEST V. NYC DOC

14 F. Supp. 3d 348; ALSO BENJAMIN V. FRASER 264 F. 3d 175.

THE DEFENDANTS' CITY for the most part has been notified in numerous cases that the housing related to 23/1 solitariness like violates individuals rights and that they has ignored these notifications which is also a claim that could be stated that defendnat CITY was and still is "DELIBERATE INDIFFERENCE" to the injuries that their actions causes to the plaintiff in this case.

The defendants CITY, ERIC ADAMS, LOUIS MOLINA, are task with the responsibilities invested in them to enforce the Laws of the State of New York and defendant LOUIS MOLINA DN ERIC ADAMS especially the Laws of Correction Law that Governs the Plaintiff and others inmate who are detainee in city jails.

EX-26 herein is a copy of the HALT Bill that was passed into Law on January 2021 leaving no exception of Court Order Lockdown to exist in the restriction of solitary confinement, listing the definition of "segregated confinement" as being any form of confinement where an inmate is confined to a cell for more than seventeen hours a day.

Defendants LOUIS MOLINA, ERIC ADAMS & CITY, knew of this law but purposely continued the confinement of the plaintiff ALEXANDER WILLIAMS and other inmates in a court ordered lockdown housing unit in facilities such as G.R.V.C., N.I.C. and West Facility, MDC all the while being aware of the law that restricted such existence.

Defendants ERIC ADAMS & LOUIS MOLINA, has given numerous public speeches where they personally has mentioned and/or spoke about this law that restricts this form of solitary confinement leaving them no defense of PERSONAL INVOLVEMENT.

The plaintiff names the defendants CITY, LUIS MOLINA AND ERIC ADAMS TO be added to the following Causes of Action: FOURTEENTH AMEND, FAILURE TO PROTECT UNDER STATE AND FEDERAL LAWS, EIGHTH AMEND, EQUAL PROTECTION CLAUSES, STATE LAW NEGLIGENCE, NEGLIGENCE TRAINING, RESPONDEAT SUPERIOR, MUNICIPALITY (CUSTOM), UNLAWFUL IMPRISONMENT.

The Custom, Usage, Practice Procedure of institutioning and subjecting the plaintiff ALEXANDER WILLIAMS JR, to a solitary confinement that the defendants knew or should have known was no longer appropriate and was against NYS and NYC Corr Laws, is proof that these defendants, CITY, WARDEN COURT, JEAN RENEE, DW FLEEMING, DW JONEELLE SHIVRAJ, TIFFANY MORALES, DW LISA BARNEBY, DW JOANNE MATOES, CAPT FERNANDEZ, ESU OFFICER RICHARTDS #254, ESU TEAM MEMBERS FROM BOTH OCT 12, AND OCT 26, 2022 INCIDENTS, CAPTAIN GAINES, (SECURITY CAPTAIN), CAPTAIN WIGFALL, DR DUVERN, PRESTON RITTER, ANDREW HICKSON, KEVIN YOUNG, KEVIN WHITE, GRAVES, RAHMAN, LUIS MOLINA, ERIC ADAMS \_\_\_\_\_, engaged in a conduct that they knew was unlawful and was used purposes to deter and/or to affect the plaintiff ALEXANDER WILLIAMS JR, criminal and civil cases in an adverse manner in hopes of gaining an unfavorable outcome for the plaintiff ALEXANDER WILLIAMS JR,.

Further proof of this facts is that Southern district Judge LEWIS LIMAN who is the judge presiding over the matter of ALEXANDER WILLIAMS JR. CITY OF NEW YORK ET AL, 19-CV-3347 (LJL), found the needed in the matter to issue Defendant BERNARD MATHIS by way of his Corporation counsel attorney a stark warning that he and other DOC Officials some named herein needed to tread lightly, and if he found out that there were conduct that was taking place that was geared towards changing the course of the matter in which he is presiding over he himself would pursue federal charges.

The warning was issued after attorney who represented the plaintiff in that case from the law firm of PAUL, EISS, RIFKIND, WHARTON & GARRISON, presented evidence in the form of testimony, of affidavits from Eric Abrams Esq explaining that they had spoken to numerous witness(es) to conduct from DOC Officials who was stating that their conduct was geared towards the plaintiff because he would not dismiss his lawsuit against CAPATIN BERNARD MATHIS.

Furthermore the usage of the 23/1 was affecting the plaintiff case by way of limiting his communication with each of his attorneys, JULIE CLARK, JEFFREY CHABROWE, ERIC ABRAMS, HILLARY BLACK, DAN BELLER, ROBERT OLOUGHILN, TRACUIE A SUNDACK1, WHICH WAS AFFECTING THE WAY THAT THE PLAINTIFF MARSHALLED HIS DEFENSE IN EACH OF THE MATTERS IN WHICH THESE LAWYERS REPRESENTED HIM ESPECIALLY THE CRIMINAL MATTER WHICH WAS THE MOST IMPORTANT.

WHEN THE plaintiff reached the point of believing that he had no way of stopping what was taken place as described herein, it led to numerous occasions of being placed on suicide watch, numerous occasions where he wrote his attorney and contemplated pleading guilty to a murder that he didn't commit and many occasions of contemplating dismissal of civil litigation in order to stop the injuries that were purposefully being inflicted upon him.

The Courts has already noted in more recent years a handful of cases where the New York State Appellate courts dismiss cases where defendants pleaded guilty after being shown evidence when prison conditions and long extended waits before commencement of trial prejudiced the defendant and affected his defense.

By way of the 23/1 lockdown order and the conduct in which it was used against the plaintiff in, he was prejudiced by lack of communication

with his defense team and private investigations and investigators, that prevented him from instructing them to speak with witness(es) that had either died by time he was able to do so as in an eye witness by the name of **SHELIEAN WELLS**, witness to the alleged eye witness in his murder case who wrote the Kings County District Attorney Office and stated that she was a family member of the person stating that they witness the plaintiff commit the shooting but was lying to cops. By the time the plaintiff became aware of this his investigators were two years behind the 8 ball and was unable to locate the person at the address left on the envelope that was mailed to the DA office.

This is just some of the ways that the 23/1 unlawful; lockdown was prejudice to the plaintiff **ALEXANDER WILLIAMS JR.**

Which nearly lead to the outcome of him pleading guilty just to get free from being subjected to such unconstitutional conditions.



PLAINTIFFS' LEGAL ARGUMENT IN SUPPORT  
OF RECEIVING INADEQUATE MEDICAL CARE AS WELL AS  
DEFENDANTS CONDUCT OF BEING DELIBERATE & INDIFFERENT  
TO HIS MEDICAL CONDITION AND MEDICAL EMERGENCIES

The plaintiff has displayed throughout this complaint the times that defendants named herein refused to contact medical when he was in need of a medical emergency even when being informed that the plaintiff may have been bleeding internally.

To add to this argument the plaintiff would like to display to the court the following Grievance/complaints filed that support that the denial to medical care was deliberate and tied to a Custom, Practice, usage, Procedure and/or rule of the defendants' CITY in which restricted the plaintiff from proper care even after and before a life changing surgery in the removal of his GallBladder.

On August 07, 2022 the plaintiff suffered an asthma attack from heat exhaustion and medical was not afforded when he requested see EX-1.

On August 13, 2022 the plaintiff formally complained about not being produced to over a 100x medical appointments see EX-2.

On August 25, 2022 the plaintiff filed a grievance in regards to not receiving medical care and someone other than himself signing refusal forms or saying that he refused, See EX-3.

On August 31, 2022 the plaintiff filed a grievance in regards to DOC officials and the SRT team preventing him from going to the facility clinic after he was summoned due to having a mental breakdown which his mental health records support the severe mental issues that he has, See EX-4.

On August 31, 2022 the plaintiff filed a grievance displaying that he was having sharp pains and believed that it was due to a gallbladder infection recognizing such from having the same issues medically in the past, See EX-5.

On August 31, 2022 the plaintiff filed a grievance documenting that the doctors are conducting sick-call rounds before the housing unit is up and failing to inform the inmates that they are present to take their medical request, See EX-6.

On August 31, 2022 the plaintiff filed a grievance documenting that he was having a constant pain in his right shoulder and wrist and a tear near his anal area due to an extraction and was being denied care for such since Jan 13, 2022, See EX-7.

On September 1, 2022 the plaintiff filed a grievance in regards to having a severe constant pain and DOC officials failing to produce him for surgery appointments as retaliation, See EX-9.

On September 3rd 2022 the plaintiff filed a grievance showing that DOC Officials removed his suicide watch officer because the facility claimed to be short of staff, See EX-9.

On September 1, 2022 the plaintiff filed a grievance complaining of sharp pains in his stomach area, See EX-10.

Herein the complaint the plaintiff references EX-H AS BEING A COLLEGE OF MEDICAL DOCUMENTS SHOWING THAT HE MISSED OVER 50 DIFFERENT MEDICAL APPOINTMENTS.

EX-1-10 including EX-H displays the deliberate in DOC officials as well as the plaintiff when it was in regards to the plaintiff's medical care.

Defendants herein including defendant CITY, by way of DOC officials maintained a custom, usage, practice and policy that

inherited the defendants and other DOC Officials with the power to delay, prohibit, or cause to delay and prohibits inmates including the plaintiff ALEXANDER WILLIAMS JR, from being provided with medical care during medical emergencies and making decision in regards to people medical care when City Policies state that all medical decision for pretrial detainees shall be made by medical personnel only.

In EX-H the court will find numerous occasions when the plaintiff was not produced for nursing and the reason for such non-production is not listed, whereas DOC Officials are not privileged to inmates including the plaintiff ALEXANDER WILLIAMS JR, medical needs and medical conditions and unaware if nonproduction can be hazardous to the plaintiff rights and healths.

In EX-H, THE COURT WILL FIND NUMEROUS MENTAL HEALTH REQUEST FROM MENTAL HEALTH PERSONNEL WHERE THE PLAINTIFF WAS NOT PRODUCED without DOC officials having knowledge if these nonproductions are hazardous to the plaintiff mental health care.

These denial without substantial reason at such a high rate and high amount constitute deliberate indifference to the health of the plaintiff ALEXANDER WILLIAMS JR.

In The instances before and after the plaintiff gallbladder Surgery the defendant named herein as well as other unnamed DOC Officials failed to produce the plaintiff to medical emergencies and medical calls outs and post surgery appointments at Bellvue hospital and the facility clinic without care and without knowing of the seriousness ~~xxxxxxx~~ that such denial posed to the risk of damage to the plaintiff's health even when it was obvious that the need for medical care was urgent like when the plaintiff reported that he was bleeding from his rectum and experiencing

sharp pains in the area where he had just had surgery, See HATHAWAY V. COUGHLIN, 99 F.3d 550, 553, (2dCir. 1996)

Any reasonable person who is informed by another that they are bleeding and in severe pain would assume that said person is in need of immediately medical care.

In the matter before the court not only did the defendant failed to address the plaintiffs' ALEXANDER WILLIAMS JR, MEDICAL ISSUES WHEN HE reported them to them the defendant CITY established a written policy set in EX-a, WHICH DOCUMENTS JUST BECAUSE THE PLAINTIFF IS CLASSIFIED AS BEING A COURT ORDER LOCKDOWN INMATE THAT HE AND OTHER LIKE HIM IS NOT ALLOWED to be seen or seek medical attention and medical care at the facility clinic area unless it is in need of an emergency and when the emergency did take place SOC Officials still maintain such a practice, usage and policy, custom.

As a result of such practices, customs, usages and procedures the plaintiff suffered damage that is irreparable and his Constitutional rights in various Amendments were violated as a direct and proximate cause of the defendant's conduct.

VIOLATIONS UNDER 42 USCS § 2000DD

42 USCS 2000dd ensures that no individual in the custody or under physical control of the United States Government, regardless of nationality or physical location, shall be subjected to cruel, inhumane, or degrading or punishment.

The plaintiff explains and list footage as supporting evidence that on Jan 7, 2023 he was ordered to stand naked in the middle of his cell with his hands behind his back for over two hours, while other inmates were not subjected to such. While standing naked the plaintiff explains that he was placed on display and named several SRT team members by vest number who came and turn the lights off and on for female officers to laugh and see the plaintiff, to make sure that the plaintiff was still naked and to mistreat the plaintiff in a cruel and inhumane fashion.

As a result of such treatment the plaintiff explains that he became depressed and suicidal and informed mental health staff MS KOONEY of such on Jan 12, 2023 at approximately 3:00pm.

VIOLATION OF PLAINTIFF RIGHTS PURSUANT TO THE AMERICANS  
DISABILITIES ACT TITLE II 42 U.S.C. § 12131 ETSEQ

The plaintiff has been incarcerated at the New York City department of Correction for over five years now. Since being incarcerated the plaintiff has been diagnosed with the following disabilities: \_\_\_\_\_

\_\_\_\_\_, and has been prescribed medication to address these medical mental health issues.

The plaintiff is also routinely seen by mental health doctors and clinicians for counseling in addressing and healing with the mental issues that he has.

The plaintiff also has an history of pediatry issues that lead to him being given a cane, and has recently been having issues hearing is is a known asthmatic detainee.

The plaintiff describes the condition that he was forced to lived under (1) not having any hot water to shower in even though a work order was placed in to fix the hot water the plaintiff was never moved to a different cell or unit where the water was not freezing cold, (2) not being able to use his cane to walk due to constantly being placed in Enhance Restrict set up illegally without due process, (3) not being allowed to see sickcall and/or mental health staff as on Jan 11, 2023 and on Jan 12, 2023 being subjected to discuss his mental health confidential business with mh MS KODNEY in the presence of defendnat SRT #135 shield number 8957.

The plaintiff serverally belives that the treatment was done to him in relation to ongoing civil litiagtion whihc also violates numerous other federal protected rights mentioned herein.

Exhibit-N herein being the plaintiff CANE PERMIT supports tha tthe plaintiff legally possed cane to assist with his walking disabilities. The defendants WARD C DEN COLLINS, CITY, WARDEN CORT bach maintined a CUSTOM, PRACTPOLICY, PROCEDURE OR RULE where the plaintiff cane was seized leaving him to hop and limp around hosuing unit without reason, "NOTICE": or hearing where he could present eveidnce as to the fact that he has a diisability Right to posession of walking cane at all times.

And that on Jan 24, 2023 the plaintiff ALEXANDER WILLIAMS JR was subjected to hoping around from law library cell to his cell from his cell back to shower area and from shower back to his cell.

On the evening of Jan 24, 2023 at approximately 9:25pm the plaintiff was not able to stabalize himself getting out of his bed and fell striking the wall with his head, suffering a head knock from not having immedatley access to his cane.

On Jan 25, 2023at approximatelyt 2:00pm the plaintiff was subjected to hopping from his cell to the front of the housing unit to be provided recreation due to the polciy of not being medically accomendated by Defendnat



named herein this complaint speifcially CITY and WRADEN who seem to be aware of such but disregarding plaintiff medical needs in medical accomendation and moving him to suitable housing that fitrs his needs.

PRELIMINARY INJUNCTIVE RELIEF:

As seen herein as Exhibit-C the policies that surround/govern NYC DOC Red I.D./Enhance Restraint classification and usage the plaintiff demand injunctive relief in the form of a Memorandum and a Pedigree as well as being placed in his floor card that he is not and Enhance Restraint Classified inmate.

The defendants can only admit that the plaintiff was never given a hearing which is needed by their own policies and which is required by law especially since the plaintiff clearly indicates that the enhance restraint set up was used against him in a Punitive fashion by his belief.

There is no evidence that the plaintiff alexandere williams jr book and case number 141-180-1632 has ever been found guilty of any form of assaultive behavior, possession of any form of weapon, cell phone, knife, scalpel ect, in the last five years under this book and case number which voids the defendants of such claims as an affirmative defense.

Due Process Procedural and Substantial is the Corner stone of the Fourteenth Amendment and is known throughout the Court system to be crucial in the events of violations involving pretrial inmates as well as convicted inmates. Example of such is the matter of DAVID WILLIAMS V. NEW YORK CITY DEPT' OF CORRECTION 2005 U.S. Dist. LEXIS 3393 (S.D.N.Y. MAY 2ND 2005), where the Court in this circuit ruled summary judgment in favor of pretrial detainees such as the plaintiff in this case ALEXANDER WILLIAMS JR is where DOC failed to provide timely hearing and medical review for enhance restraint red I.D. Status.

Other precedent case law such as WOLFF V. McDONNELL 413 U.S. 539 SET THE PRECEDENT as in regards to the need for Due Process, Notification and hearing before subjecting even a convicted prisoner to sanctions and deprivation not subjected to the average prisoner within a facility.

Other Preliminary Injunctive relief that the plaintiff sought is as followed:

Plaintiff demand to be produced to every medical appointment that he is called for. The plaintiff suffers from numerous medical conditions and has surgery appointments, therapy appointments and nursing appointments that he is never produced to and medical records state no reason plaintiff is not produced to these appointments.

In more recent cases law such as the matter of AGNEW V N.Y.C. DEPT OF CORRECTION, 2021 N.Y. MISC LEXIS 5134, the Department of correction was placed in contempt when not abiding by the orders of Bronx Justice Honorable Elizabeth a. Taylor.

In the plaintiff case it seems as the plaintiff made clear that his denial of medical care is tied directly to being retaliatory due to his grievances and ongoing civil litigation naming high uppers DOC officials such as Charlton Lemon, Louis Molina and Mayor Eric Adams in the case of WILLIAMS V. CITY OF NEW YORK ET AL., 22-CV-3919 (PGG)(KHP) and WILLIAMS V. CITY OF NEW YORK ET AL., 22-CV-10537 (UA).

In the year of 2022 over 20 inmates died on Rikers Island and DOC officials tied most of the death to on going medical issues already possessed by these detainees. That being their legal argument an inmate such as the plaintiff who has already had two close to death medical incidents should never miss a medical appointment at all.

**CAUSES OF ACTION IN THIS COMPLAINT**

REQUEST FOR DECLARTORY RELIEF:

The plaintiff is also demanding Declartory Relief in the form of correcting and chagging the plocies of CLO 13/21 as it relates to its entirity due tothe fact that the signing of New York State Halth Act prohibits one from being hosued in any fashion of being 23 hours locked in a cell per& day.

Also that CLO 13/21, progibits detainees from being able to go to the facility Clinic, Law Library, and Social Service ares.

Also that CLO 1321 Authmatically classifies Court Orders inamtes as being Enhance Restarint Status without affording Due Process hearings and that it is also classifying detainees as being Captin Escort whihc is another stuats used by New& Yoprk City Department of Corrections for punitive purposes.

THEplaintiff ask fro declartory Relief in the form of stopping completely the usgae, polciy, practice of monitoring, listening, interfeing with any detiness communication with an Attorney by way of recording, calling and speaking to be fore allowing the detinee to speak or standing near in ear shot distance.

The plaintiff demand Declartory Relief in the form of ordering the defendnat CITY by way of NYC DOC to produce the plaintiff and all detinees to any/all medical appoints inclduing those within the facility as those outside of the facility.

The plaintiff demands Declartory Relief in the form of Adqaute Training to Securiby Officers in relatioins to knowing the Constitutional Rights of any/all classification of Detainees in all aspects.

It is clear that the defendnat named herein this complaint that are assigned the position of Secuirty Officer lack the tarining

mental capacity, maturity, or supervision to know the rights of the inmates in which they are employed to come in contact with or are ordered to engage in certain acts with.

These officers may believe that they are acting within the scope of their duties when in actuality their conduct is not within the scope of their employment which is support and proof or being poorly trained and supervise in areas of the jail in its entirety.

The plaintiffs ask that the Courts, The federal Government and others be tasked with creating and instituting a comprehensive plan with realistic goals to reach a level of compliance within the facilities that make up Rikers Island.



AS AND FOR A FIRST CUASE OF ACTION FOR  
VIOLATION OF FIRST AMENDMENT RIGHTS PURSUANT  
TO U.S.C. § 1983, 1985 & 1986

Plaintiff, ALEXANDER WILLIAMS JR, repeats, reiterates and realleges each and every paragraph of this complaint and further alleges:

The defendant's named herein did engage in conduct that constituted a violation of plaintiff first amend rights that (1) relaitited against the plaintiff and conduct that was not tied to any legitimate penological interest of the defendant CITY, (2) was geared towards intimidating, tampering and otherwise affecting the outcome of the plaintiff pending Federal Litigation be it as a witness or proceedings, (3) did place a substantial burden on the plaintiff FREEDOM OF RELIGIOUS BELIEF, that is protected under the FREE EXERCISE CLAUSE of the FIRST AMENDMENT OF THE CONSTITUTION, (4) did restrict/denial plaintiff from access to the court, access to incoming and outgoing mail to attorney's and the outside world, grievance, and petitioning the government .

As a result of the defendant's conduct grievances and litigation of the plaintiff was curtailed when defendant's conduct and action mentioned herein was received by the plaintiff as being designed to intimidate, place fear and to prevent the plaintiff and /or stop the plaintiff from proceeding with civil litigation and grievances as threats seen herein EXHIBIT-C.

As a result of the defendant's conduct / actions the plaintiff suffered injuries to the mind, body and soul to the degree that said injuries are irreparable leaving the plaintiff with scars eternally.

AS AND FOR A SECOND CUASE OF ACTION FOR  
EQUAL PROTECTION CLAUSE PURSUANT TO 42 U.S.C.  
§ 2000cc AND FREEDOM EXERCISE CLAUSE

Plaintiff ALEXANDER WILLIAMS JR, repeats, reiterates and realleges each and every paragraph of this complaint and further alleges:

The defendnats maintain a polciy seen herein as EXHIBIT--A that the defendnat were for warned violated court order inmaytes righst as it goes to religious freedom and religious text in that of COMMAND LEVEL ORDER 370.20 whihc was a mirror image word for word the same as COMMAND LEVEL ORDER 13/21 seen in exhibit-A , see this establishment by the court in a recnt case of FLORES V. CITY OF NEW YORK , 2022 U.S. DIST LEXIS 179347, 2022 WL 4592892 (S.D.N.Y. SEPTEMBER 30, 2022); and ANDUZE V.CITY OF NEW YORK , 2022 U.S. DIST LEXIS 177927, 2022 WL 4547420 (S.D.N.Y. 29, 2022).

In that the parctrices usgages and rule of the defendnat placed substaintial burdens on the plaintiff religious righst without any legitimate penological inrest or reason at all.

As a result of the dfendnat conduct the plaintiff was not allowed to enage in his religious studies of Judaism and was not afforded kosher meals grape juice and matzah crackers as pursunat to his religious deiaty and said conudct was purposely enforced as punishment upon the plaintiff. Along with the plaintiff being vidoe recorded whole praying sometimes naake when praying.

As aresult the plaintiff usffred injuries on the mind, body and soul atht are irreparable injuries that wil be everlasting in nature. CLO 370.20 could bee seen herein as EXHIBIT-12 for comaprison to CLO 13/21 seen herein as EXHIBIT-A.

AS AND FOR A THIRD CAUSE OF ACTION FOR  
VIOLATION OF EQUAL PROTECTION RIGHTS PURSUNAT  
THE SIXTH AMENDMENT COMMUNICATION WITH  
ATTORNEY'S AND COURT

Plaintiff ALEXANDER WILLIAMS JR, repeats, reiterates and reallegseach and every paragraph of this complaint and further allges:

The defendnat conduct from Jan 7 2023 - Jan 16, 2023 did violate the plaintiff righst as it is pursunat to his Sixth Amendment right to communicate with counsel in oprivate when defendnats from SRT stood in front of glass windown and listed to the plaintiff legal conversation with attorney SABINA KHAN.

And that defendnat engaged in conduct as a policy as GRVC where defendnats stood in front of plaintiff cell and listened to conversation with various attorney's that

defendant were aware were legal calls and attorney that were approved by the Judge in his JLO as legal personell.

And that defendnat purpsely interfered with plaintiff's with plaintiff's corresponace with attorney's and the court and cuased the plaintiff to mis the opportunity to object to counsel request for extention in his civil matter of WILLIAMS V. CITY OF NEW YORK ET AL, 21-CV-1083 (PGG)(KHP), and that said interfernce was without legitimate penological interest and was geared towards harming, intimidating or otherwise installing fear into the plaintiff fro the contiunace of litiagtion against DOC and CITY officals..

As result to defendant conduct the plaintiff falso lost out on the opportunity to respond to FIOA matters with DOJ and had to start the process all over gaain.

The conduct violated the Equal Protection Rights in pursunat to Sixth Amendment as other inmates detainnd at RIKERS ISLAND are not subjected to :

- LISTENING TO /MONITORING COVERSAATION WITH THEIR ATTORNEY'S
- THEIR LEGAL VISIT BEING MOINITORED AND LISTED TO BY DOC STAFF
- THEIR LEGAL CORRESPONDACES BEING CURTIAL/ RESTRICTED AND OTHERWISE STOPPED GOING AND COMING
- THE FACILITY CUTTING OFF OR MINIORTING CALLS WITH ATTORNEY'S WHILE ON THE PHONE
- USB WITH DISCOVERY BEING CONFISCATED AND NEVER RETURED WITHOUT CUASE OR REASON

AS AND FOR A FOURTH CAUSE OF ACTION FOR  
VIOLATION OF THE SIXTH AMENDMENT IN RELATION TO  
CONFIDENTIALITY AND PRIVILAGE COMMUNICATION WITH  
HIS DEFENSE ATTORNEY'S AND OTHER LEGAL ATTORNEY'S

Plaintiff ALEXANDER WILLIAMS JR, repeats, reiterates and reallges each and every paragrah of this complaint and further allges:

Defendants each either directly enaged in conduct that moniroed limited restricted and/or listed to plaintiff legal calls and cobersations with his attorney or signed off on , created and endorsed such a policy that violated the plaintiff cominication with counsel.

And that defendnat CITY and other named herein and not named enforced an illegal JLO that restricted the plaintiff from consulting with other counsle by calling and engaging in attempts to hire other defense counsel and cilif counsel to assit in matters of legal

that the plaintiff fhad going, by enfrocing the restriction laid out in the Judges Court order and resticting his calls to only that of the attorneys listed in JLO.

And that defendnat were placed on notice that such conducty violated court order inam RIGHTS in the matters of JOHMANNI ANDUZE V. CITY OF NEW YORK , 2022 U.S. DIST LEXIS 177927, 2022 WL 4547420 (S.D.N.Y. SEPTEMBER 29, 2022) ; and ALEXANDER WILLIAMS JR V. CITY OF NEW YORK ET AL 21-CV-1083 (PGG)(KHP) AUGUST 5, 2022 REPORT AND RECOMMENDATION.see EXHIBIT-11 and EXHIBIT-15 herein.

And that defendnat Training and duities should have informed them that such coinduct was illgeal wrong and violated plaintiff's rights and the engagement of such conduct should leave these defendnats liable individually unless defendnat CITY is wiling to admit that the training is faulty, lacking and bad.

The existance of the prior cases and the contiuation of such cases supports that defendnat Maintained a CUSTOM Polciy, usgae and practice of defendnat CITY.

AS AND FOR A FIVTH CAUSE OF ACTION FOR  
VIOLATION OF DUE PROCESS RIGHTS PURSUNAT TO  
THE FOURTEENTH AMENDMENT UNDER STATE AND FEDERAL LAWS

Plaintiff ALEXANDER WILLIAMS JR, repeats, reiterates and reallges each and every paragraph of this complaint and further allges:

The polciy seen herein EXHIBIT-A and EXHIBIT-34 violates the plaintiff rights as it dictates that the plaintiff (1) automatically is to be considered ENAHNCE RESTARINT STATUS without hearing or notice ( 2) that plaintiff's and others are to be left in ENHANCE RESTARINT SET UP while in the rec cage for an hour , (3) that plaintiff is autmatically restricted from recieving Medical care at the facility clinic, (4) that the plaintiff is automatically restricted from sending out mail, whihc is all clear evidence that the conduct that defense enaged and enforced upon plaintiff was punitive in nature and that the living condition was designed to be punitice in nature without affording plaintiff and others alike the ue Proces Rights garuantee by the United Sates Const.



EXHIBIT-35 is further proff that defendnat did enaged in said restriction without affording the plaintiff a hearing and a noitice as stated in DOC polciy seen in EXHIBIT-30 herein.

And that plaintiff rights as referring to Due Process and those alike are violated in EXHIBIT-a dn EXHIBIT-35 wheras the polciy dictates that BIBLE will be only religious text allowed and that Koshers are restricted without due process and that plaintiff's and others alike are placed on Recreation restriction perioically without due process as a normal factor leaving plaintiff and others otherwise locked in cell for 24 hours a day.

All which is illegal as seen by New York state and New york City state law and correction law as seen herein EXHIBIT-26 the HUMANE ALTERNITAIVE TO LONGTERM SOLITARY CONFIENMENT ACT passed by the stae in janurary 2021.

Defendnat CITY is liable for failing to inform Supreme Court Judges and the UNIFORM COURT SYSTEM that DOC no longer could house plaintiff and others alike in a 23/1 fashion but rather in a 17 hour fashion at the most as stated in the HALT act and furthermore that defendant CITY was on notice for such issues stating on-going polictial battles over the issue on no box plicy for the most violent inmates on Rikers Island aw well os being placed on notice in the folliwng cases : BELL V. WOLFISH, 411 US 520 ; also BELL V. WOLFISH 99 S. Ct. 1816; also BEST V. NEW YORK CITY DEP'T OF CORR 14 F. Supp 3d 348; and BENJAMIN V. FRASER 264. F. 3d 175.

And that the defendnat CITY was aware that the courts reject the stoppage of the HALT act in a matter that is widely recognized in N.Y. STATE CORRECTION OFFICERS & POLCIE BENEVOLENT ASS'N V. HOCHUL, 2022 U.S. DIST LEXIS 107145, 2022 WL 2180050 (N.D.N.Y. JUNE 16, 2022) whihc was a last ditch shot to bring back 23 hour and box units.

Defendant did enaged in conduct that constituted a violation of the plaintiff Due Process rights and that defndants did so knowly and willingly for reason other than reasonable.

- (a) The plaintiff was placed in 23 sometime 24 hour solitary confinemet like comnditions;
- (b) The plaintiff was classifed and treated as being ENHANCEW RESTRAINT even though

there was no official DOC documentation that supported that plaintiff was given NOTICE a hearing or was actually ERS status.

(c) Each defendant has direct access to the INQUIRY system that is the computer at every bubble station in each unit that can be accessed and reviewed to determine if DOC intranet system to see if plaintiff was ERS

(d) Each defendant had access to plaintiff floor card to determine if he was Jewish

and should be afforded religious meals and possession of religious Jewish material

(e) defendant CITY was placed on notice that policy, practice violated the plaintiff rights in the matter of ALEXANDER WILLIAMS JR V. CITY OF NEW YORK ET AL 21-CV-1083 (PGG)(KHP) REPORT AND RECOMMENDATION AUGUST 5, 2022.

AS AND FOR A SIXTH CAUSE OF ACTION FOR  
EQUAL PROTECTION RIGHTS PURSUANT TO DUE PROCESS

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Plaintiff ALEXANDER WILLIAMS JR , repeats, reiterates and realleges each paragraph of this complaint and further alleges:

That the defendant Robbed the plaintiff of the same equal Protection Due Process rights as those inmates that are detained in other facilities through Rikers Island and the other jails maintained and ran by defendant CITY

As a result of the violation stated in Cause of actions Five and Six the plaintiff suffered injuries that are irreparable in nature humiliated and mental trauma that he would not have faced otherwise the conduct engaged in by the defendants.

The plaintiff was placed in solitary confined a setting that was abolished by the law without his consent and suffered mental distress and trauma that constitutes injuries stated herein.

AS AND FOR A SEVENTH CAUSE OF ACTION FOR  
FAILURE TO PROTECT UNDER STATE AND FEDERAL LAWS

Plaintiff ALEXANDER WILLIAMS JR, repeats, reiterates and realleges each paragraph of this complaint and further alleges:

That the defendant failed to adhere to separation of the plaintiff and inmate Christopher Cano as from the incident that is mentioned and core of the complaint in the matter of WILLIAMS V. CITY OF NEW YORK ET AL, 22-CV-3819, and did so knowingly and willingly

disregarding their mandatory duties.

Then defendant did the same when plaintiff was subjected to being housed in same facility with defendant ERIC GANIOUS who maintained the position of SECURITY CAPTAIN and had instituted a department wide separation by way of affidavit seen herein as EXHIBIT-39.

AS AND FOR AN EIGHTH CAUSE OF ACTION FOR  
VIOLATION OF EIGHTH AMENDMENT RIGHTS PURSUANT  
42 U.S.C. 1983  
CRUEL AND UNSUAL PUNISHMENT

Plaintiff ALEXANDER WILLIAMS JR, repeats, reiterates and realleges each and every paragraph of this complaint and further alleges:

defendant were well aware of the HALT act and the fact that is discontinued solitary confinement, SHU/BOX and 23/1 lockdown but engaged in conduct that continued this classification and housing when it came to the plaintiff and other alike.

defendant LOUIS MOLINA, ERIC ADAMS and THOMAS GRIFFIN and AC MILLER have given public and unpublic interviews in regards to this exact setting of detention and confinement and yet walked toured the lockdown housing unit with full knowledge that such unit had been abolished by HALT act.

Each defendant had access to an entire legal division of New York department of Correction legal where they could have asked for guidance in regards to the setting and questioned whether a judge had legal authority to override a state and correction law.

defendant each of them could have contacted DOC and LEGAL liaison person and ask that an email be sent to the court seeking guidance due to the passing of the HALT act law.

As stated herein each defendant had intimate knowledge that defendant CITY and DOC no longer housed detainees in a lockdown fashion or manner for any reason pursuant to NYS and NYC correction law .



At each and every instance stated herein this complaint defendant conduct was committed agaainst the plaintiff while or durring plaintiff was lockdown in exact setting as that of the BOX whihc is punitive with no end date under solitary confinement .

As employee holding the title as "PEACE OFFICERS": each of the defendnats are also bou by duty toi protect and enforce CITY, STATE and FEDERAL law and each faailed in their duites as such.

In each instance each defendant failed to live up to their OATH as a PEACE OFFICER and engaged in condtc/action that was Abritary and Caprioucios causing suerve injuires to the plaintiff ALEXANDER WILLIAMS JR, as well as enaged in constant behvaioir because of the plaintiff's practices that rightfully challegned poilcies and laws of his confinement as he had the right to do .

Thje defendnat enaged in conduct that denied the plaintiff libery the right to cleaning his cell , a clean and health enviorment, that subjected the plaintiff rto being lock in a cel lwithout medical recreation, telvision, reiligious material, food pursunat to his religious diet and caused the plaintiff to live in INHUMANE liuving condition as punishment while other in same classification was afforded opportunity to use the bathroom and not a garbage bag to bathroom i, to have a tv in there cell or in front of their cell, to engage in freedom of religious practice and more.

This condcut was the direct and proximate cause of the plaintiff attempting suicide on numerous occassion, being a mental health patient and being subjected to inadquate medical care while in the custody of the New York city Depoartment of Correction.

AS AND FOR THE NINTH CAUSE OF ACTION FOR  
VIOLATION OF EQUAL PROTECTION RIGHTS  
PURSUNAT TO THE EIGHT YH AMENDMENT 42 U.S.C. 1983

Plaintiff ALEXANDER WILLIAMS JR, repeats reiterates and reallges each paragraph of this complaint and further allges:

that the defendnat knowingly, willingly and pursoely enaged in conduct that wa geared towards violating the plaintiff equal protection rights as that other court order lockdown inmate are housed in a fashion as West Facility and N.I.C. where they have acces to TV's in their cell and the plaintiff is not.

The defendnat violated the plaintiff equal protection rights where other court order inmates right in the same housing unit with the plaintiff had access to a telvisdon of their own like RICKY TORESS in 1a cell ~~and~~ 7 and cells 2- 5 in 1a as well.

The defendnat knowingly, willing and purpsoley violated the plaintiff due proces and eqaul protection rights where the other inmates where not subjected to three cameras recording them when they showered and sleep naked in their cell at west facility such as the plaintiff was, and that the plaintiff was in a glass cell where ~~inmates~~ male and female and inmates accross from him could view him showering and getting dressed.

xxxxxxx~~The defendnat~~

The defendnat violated the plaintiff equal protection rights when the plaintiff was su to having to meet and speak with mental health staff in the ear and eye sight of other inmates, correction staff and in a manner that violated medical and patient relation confident lity and other inmates were not subjected to the same.

AS AND FOR A TENTH CAUSE OF ACTION FOR  
VIOLATION PURSUNAT TO THE FORUTH AMENDMENT  
42 U.S.C. 1983 UNREASONABLE INTRUSION

Plaintiff ALEXANDER WILLIAMS JR, repeats, reiterates and reallges each paragraph of th complaint and further allges:

The defendnat, did sunject the plaintiff to unreasonable intrusion and did engage in conduct while plaintiff was under unreasonabel intrusion circumstances and did search plaintiff stripping him naked knwoingly that plaintiff was being recorded while being naked whihc is against CILy and DOC polcies, and that their was no penoligical legitimate inrest in doing so.

the defendnat violated the plaintiff rights as it relates to the fourth amendment of the United sates Constitution wheereas defendnat had already reached an agreement in this same matter and accepted a settlement in the case of NUNEZ V. CITY OF NEW YORK, 2015 U.S. DIST LEXIS 176190 (S.D.N.Y. JULY 10, 2015) where it was outline in the section makered settlement under "COMPREHENSIVE VIDEO SURVIELLANCE OF JAILS"; DOC will install suffieicnet additional wall-mounted video surveillance cameras throughout the CITY jails to ensure complte camera coverage of CITY JAILS, with certain narrow exceptions such as the interior of SHOWER AERAS and TOLIET AREAS. Defendnat CITY agreing that such would be properly in place and complited by February 28., 2018. The plaintiff complaint herein surpassed this date by five years and the defendnat CITY is void of any legal argument that would cure a reason why there would be cameras in a plaintiff or inmate cell video recording shopwer and toilet areas and conducting strip searches under these same conditions.

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AS A RESULT OF THIS CONDUCT AND FACTOR THE PLAINTIFF'S RIGHTS WERE VIOLA AND SUBJECTED THE PLAINTIFF TO INJUIRES IN THAT OF MIND BODY AND SOUL AND THAT HIS BODY AND OTHER PARTS WERE RECORDED AND UNLAWFULLY STORED WITHOUT HIS CONSTENT OR THE DEFENDNAT HAVING PERMISSION TO OTHERWISE DO SO.

AS AND FOR AN ELEVENTH CAUSE OF ACTION FOR  
RELEIF UNDER NEGLIGENCE UNDER 42 U.S.C 1983

Plain8tiff AALEXANDER WILLIAMS JR, REPEATS, REITERATES AND REALLGES EACH PARAGRAP OF THIS COMPLAINT AND FURTHER ALLGES:

At all times herein defendnats CITY was in charged with the hiring, training, retention and direction, syupervision, discipline and oversight and promotion of all correction officers, supervision and staffing its employments including but not limited to the defendnats, named herin as employees of defendant CITY.

At all times allged herein defendant CITY assumed a duty of care to plaintiff ALEXANDER WILLIAMS JR.

at ALL TIMES ALLGED HEREIN DEFENDANT city WAS ENTRUSTED WITH A SPECIAL DUTY TO CARE TO THE PLAINTIFF alexander williams jr.

Defendants CITY and its agents servants employee including but not limited to those named herein owed a duty to reasonable care to protect the plaintiff ALEXANDER WILLIAMS JR, while he was in their custody, control and care.

Defendant CITY, its agents, employees and/or servants, including but not limited to those named herein this complaint, owed the duty of affording the plaintiff ALEXANDER WILLIAMS JR, Due Process rights of a hearing before limiting restricting him from that of medical care, being enhance restraint, placed in solitary confinement with hearing, affording him medical treatment in area area fit for the criteria under NYS for medical treatment versus being examined through a cell door window, being restricted from being able to practice the religion of his choice, being able to be afforded meals pursuant to his religious diet, being afforded recreation without limitation and restriction without a hearing, being afforded right to meet and speak with counsel in a confidential manner and whatever other violation that the court may find after construing the plaintiff's complaint as liberal as possible.

As set forth above defendant CITY and its agents servants and employees including but not limited to those named herein knew or should have known by reasonable diligence that their conduct was displaying the propensity to engage in such conduct that would violate the plaintiff and other alike rights

The defendant including CITY should have known that their conduct was also unacceptable from the matter of PEOPLE EX REL, BRUCE V. SCHIRALDI, as well as the daily news articles where supreme court Justice Elizabeth Taylor released inmates without bails over the exact kind of condition described by the plaintiff herein this complaint.

AS AND FOR A TWELTH CAUSE OF ACTION FOR  
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

Plaintiff ALEXANDER WILLIAMS JR, repeats, reiterates and realleges each paragraph of this complaint and further alleges:



As set forth above and within this complaint the defendnat named herein aforsaid condcut was Intentional, Malicious and execessivie and served no reasonable or legetimate penological ~~government~~ interest.

The enforcement of restricting the plaintiff AALEXANDER WILLIAMS JR, from ENGAGING IN PRACTICE OF HIS RELIGION, RESTRICTED FROM RELIGIOUS MEALS, RECTITED FROM (1) HOUR RECREATIO WITHOUT HEARING OR NOTICE, RECLASSIFICATION FROM NORMAL TO ENHANCE RESTRAINT WITHOUT HEARING OR NOTICE, PLACED IN SOLITARY CONFINEMENT THAT WAS ABOLOISHED BY STATE AND CORRECTION LAW HALT ACT, ILLEGAL MONITORING BY WIRE AND DOC STAFF OF HIS LEGAL CALLS AND COUNSEL VISIT WITHOUT A WARRANT, SUBJECTED TO LIVING UNDER INHUMANE CONDICTIONS AND other violation of State and Federal laws stated hereiin was intentional and maliciously instituted without care of the injuires to the Plaintiff ALEXANDER WILLIAMS and the State and fedear statues along with Correction laws in which are designed and in placed to protect the plaintiff and other alike.

The defendnats engaged in illicts enorcement of polices written and unwritten knowingly that said polcies were wrong and violated plaintiff rights and did so with a malice intent due to the plaintiff's record and history for civil litigation and the publishing of his book that exsposed Rikers Island titled "THE TRUE UNTOLD STORY OF NEW YORK CITY'S NOTORIOUS RIKERS ISLAND". These polcies such as the one seenherein EXHUBITY-A clearly are wrong and enforce restriction on the plaintiff and other alike and did affect that plaintiff state of mind mentally, and affected the plaintiff spirituallity.

As set forth above and within this complaint defendant intentionally, recklessly and/or negligently engaged in conductthat was egregious and outrageous in nature that exceeded all bounds usually tolerated by society and unreasonably and dangerous to plaintiff's psychological and emotional well-being.

As a result of the foregoing, Plaintiff ALEXANDER WILLIAMS JR, suffered and continues to suffer permanent psychological and emotional injuires.

The plaintiff religious spirit ~~beliefs~~ has been attacked, damaged and suppressed by defendnatenforced of restriction of not just religious tex and religious diet but restiction of any Jewish Material unless it was a BIBLE or text of that of the Christain religion.

The defendnats conduct along with the global up-rise of anti-semtic langauge, actions, comments, and behavior that has been sprewed against those who are Considered JEWISH has reached the New york city department of Correction front door and has spilled into the actions and conduct of the servant, agents and employees of the defendnat CITY.

AS AND FOR A THIRTEENTH CAUSE OF ACTION FOR  
VIOLATION OF RIGHTS PURSUANT TO 42 § U.S.C.  
1985(2)&(3)

Plaintiff ALEXANDER WILLIAMS JR, repeats, reiterates and realleges each pargraph of this complaint and further allges:

That the defendnat, did engaged in action/condcut that was specifically designed to violate the plaintiff's rights, cauisse harm, initmidate or otherwise convince the plaintiff to drop his law suit aghainst defendnats , servant agents of the defendnat CITY in that matter of Assistant Cheif CHARLTON LEMON who is named as a defendant in plaintiff case seee, ALEXANDEWR WILLIAMS JR V. CITY OF NEW YORK ET AL, 22-CV-3819(PGG)(KHP), an that said condcut and actions did not occur until after NEW YORK CITY law dfepartment may have possible opted out of representing assistant commissioner CHARLTON LEMON in that matter as the plaintiff submitted letter from counsel at Law department stating such in EXHIBIT-29 herein.

This factor satisfies the adverse prong as well as the fact that the plaintiff understood and belöved that the conduct was geared towards (1) OBSTRUCTING JUSTICE, (2) INTIMDATING HIM AS A WITNESS, &(3) DEPRIVING HIM OF PPROTECTED AND GAURANTEED RIGHTS AFFORDED BY STATE AND FEDERAL CONSTITUTIONS AS WELL AS CORRECTION LAW.

The plaintiff ALEXANDER WILLIAMS JR, UNDERSTOOD THAT BY INFORMING HIM OR OTHERWISE NORMALIZING THEIR CONDUCT THAT HE WAS ONLY BEING SUBJECTED TO SUCH INJURIES DESCRIBED HEREIN BY DEFENDNATS NOT BECAUSE HE HAD VIOLATED RULES AND REGULATIONS OF THE DEPARTMENT OF CORRECTION, BUT RATHER BECAUSE HE HAD AN OPEN LAW SUIT AGAINST SPECIFICALLY CHARLTON LEMON AND PUBLISHED A BOOK EXPOSING DOC WRONG DOING AS HE WAS TOLD BY DEFENDANT NUMEORUS TIMES OVER.



This admission and normalization by the defendnat named herein who were trained and tested on matters of NYC DOC rules and regulations is clear and understanding that these defendants knowingly, willingly engaged in conduct that was specifically geared towards deterring, forcing, threatening and intimidating the plaintiff ALEXANDER WILLIAMS JR into dismissing , or testifying in favor of or otherwise making solely ASSISTANT COMMISSIONER CHARLTON LEMON innocent in the claims against him that is pending within Judges at the SOUTHERN DISTRICT COURT.

Defendnats conduct was the direct and proximate cause of the plaintiff injuries, falling into deep depression, attempting suicide by starvation and emotional and spiritual injuries that are permanent in nature.

The plaintiff was conscious and did not consent to such conduct inflicted upon him by all and each defendnat named herein the complaint.

AS AND FOR A FOURTEENTH CAUSE OF ACTION FOR  
VIOLATION OF RIGHTS PURSUANT TO 42 U.S.C.

§ 1986

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Plaintiff ALEXANDER WILLIAMS JR, repeats, reiterates and realleges each and every paragraph of this complaint and further alleges:

That the defendnats in this complaint each had an opportunity of preventing violation of the plaintiff's civil rights , each had the responsibility of preventing violation of the plaintiff's civil rights, each had direct knowledge that their conduct was improper wrong and unlawful and each failed to do anything other than engage in the same conduct and behavior as the next defendnat named herein.

The defendnat concerns were about that of ASSISTANT COMMISSIONER CHARLTON LEMON and not of the rights of plaintiff ALEXANDER WILLIAMS JR, in that they each and collectively and together failed to abide by their duties as according to mandatory duties under NEW YORK CITY ADMIN CODE § 9-108(C), CORRECTION LAW § 500-C(4), Subdivision 23 of section 2 of CORRECTION LAW as well as Subdivision 33 and 34, and the RULES of the CITY of NEW YORK 40 §§ 3-02(B)(4), (C)(1) and (C)(4), along with other duties to that owed to the plaintiff including but not limited to protecting the plaintiff from further harm and

and from such wrongful conduct even if said wrongful conduct is being committed by other correctional personnell that was claerly a conspiracy in intimidating, forceing, placing fear, threatening plaintiff to drop a peniding Federal Law suit.

Defendnat named herein should have known and could have acted like that of a reasonabl other person and dilligently could have prevented . reported EEO complaint and could have preventyed further damage and injurires suffered by the plaintiff after they were notified and witnessed or was forced to engaged in simular conduct durring the time that they were posted on plaintiff's hhousing unit or otherwise came in contact with the plaintiff's as mentioned herein.

These defendants failure to prevent further harm ands to prevent further actions in conspricay was direct and proximate result of plaintiff's injuries of pain, suffering, susbstantial and procedual due process suffering and that said conduct could have been stopped or paused before the filing of this complaint.

AND AS FOR AN FIVTHTEENTH CAUSE OF ACTION  
FOR VIOLATION OF EQUAL PROTECTION RIGHTS AS IT  
TO HOUSING FOR COURT ORDER LOCKDWON INMATES

Plaintiff ALEXANDER WILLIAMS JR, repeats reiterates and reallges each paragraph of this complaint and further allgesd:

The defendnats are knowingly, willingly and purspoely ignoring the amdnements made to CORRECTION LAW in reagrds to the HUMANE ALTERNITIVE TO LONGTERM SOLITARY CONFIENMENT ACTR passed by New york state legistlators that amended the CORRECRTION LAW section 2 of subdivison 33 and 34whihc core states that CORRECTIONdepartment if prohibited from maintaining a classification where inmates are locked inside of a cell for more than 17 hours per day.

The plaintiff is denied the Equal Protection rights of every other detainee that is not housed under these conditions that may be in population committing acts of violence and abuse and still locking out of their cells for more than 17 hours each day.

Defendants CITY, LOUIS MOLINA, ERIC ADAMS, THOMAS GRIFFIN, AC MILLER WARDEN COURT and others named herein are aware of this law for the six named defendants have taken meeting, given interviews and answered question in regards to the HALT ACT and other are aware that inmate in population of the most violent type are not being subjected to such 23 hour lockdown inside of a cell.

The defendant attempt to hide behind a Supreme Court Judges Order is not an affirmative defense and ignorance of the law is not a legal defense in that ART III of the New York State Constitution lays out the Authority for a Judge and ARTX III clearly indicates that a sitting Judge must abide and enforce the laws of the state not have the Authority to override or disregard the law of the state as in the HALT Act.

Furthermore the defendant each have access to the DOC / COURT liaison email and contact clarification and guidance could have been sought in the matter of the HALT ACT after its passing and that when said individuals named herein as defendant failed to do such created and left those defendant and other liable for the injuries and pain and suffering of the plaintiff ALEXANDER WILLIAMS JR.

Many defendants were notified by the plaintiff themselves as seen herein grievances and appeals submitted in regards to his constant confinement of 23 hours a day and other seem to have known but engaged in conduct of enforcing the 23/1 lockdown out of spite ignorance and punishment against the plaintiff for his constant litigation.

As a result of the defendants failures and conduct was the direct and proximate cause of the plaintiff pain and suffering and mental trauma leaving the plaintiff with mental anguish that is irreparable and in many cases similar are not even discovered as of yet.

AS AND FOR A SIXTEENTH CAUSE OF ACTION FOR  
DELIBERATE INDIFFERENCE TO PLAINTIFF MEDICAL AND  
MENTAL HEALTH NEEDS:

Plaintiff ALEXANDER WILLIAMS JR, repeats reiterates and realleges each paragraph of this complaint and further alleges:

Defendant did maintain a policy and engaged in conduct that was deliberate indifference to the medical needs and mental health needs of the plaintiff and denied the plaintiff medical and mental request as in accordance with 40 RCNY § 3-04(b)(6).

This deliberate indifference include but not limited to the occasion where the plaintiff was denied without reason or cause emergency sickcall, medical emergencies and surgical trips to outside hospital BELLVUE after DOC medical staff making the appointments and taking all of the proper precaution to protect the plaintiff in his medical disabilities.

And that the defendant by way of enforcing JLO against the plaintiff was aware that the plaintiff was unable to contact sickcall using DOC 614# number and was the conduct of defendants that caused the plaintiff to number inhouse medical appointments as seen herein EXHIBIT-H.

And that defendant MARDEN on Jan 17 and Jan 18, 2023 was deliberate indifference to plaintiff medical needs were plaintiff informed defendant CO MARDEN that he was suffering from ASTHMA ATTACK and having difficulties breathing and defendant MARDEN failed to act in accordance with DOC policy and 40 RCNY § 3-02(d)(1) which states :

ALL INMATE REQUEST FOR EMERGENCY MEDICAL OR DENTAL ATTENTION SHALL BE RESPONDED TO PROMPTLY BY MEDICAL PERSONNEL. THIS SHALL INCLUDE A FACE TO FACE ENCOUNTER BETWEEN THE INMATE AND THE APPROPRIATE HEALTH CARE PERSONNEL.

Insteads defendant MARDEN failed to call for the medical emergency for the plaintiff because he didnt believe that the plaintiff was having difficult time breathing and was unable to locate a captain for housing unit stating that a captain must be present before an inmate in a court order lockdown could receive medical care. This violates DOC policy of 40 RCNY § 3-02(d)(4)(ii) stating :CORRECTIONAL PERSONNEL SHALL NOT INTERFERE WITH AN INMATES ACCESS TO INFIRMARY SERVICES OF THE DURATION OF CONFINEMENT IN THE INFIRMARY AND SHALL TRANSFER INMATE TO AND FROM INFIRMARIES PROMPTLY WHEN REQUESTED.

This caused the plaintiff to suffer from asthma attack without and medical assistance requested from defendant MARDEN and forced plaintiff to use a plastic bag to nurse himself and control breathing .

As a result to both the plaintiff was left in serve pain when requesting medical at West Facility and at GRVc and left in asthma attacks due to defendants believing that they as correctional officer control inmates medical request and as they engaged in said conduct action were the direct and proximate cause of the plaintiff's injuries of pain and suffering mentioned herein.

The plaintiff ALEXANDER WILLIAMS JR , WAS CONSCIOUS AT ALL TIMES AND DID NOT CONSENT TO SUCH CONDUCT NEVER.

AS AND FOR A SEVENTEENTH CAUSE OF ACTION FOR  
DEPRIVATION OF FEDERAL CIVIL RIGHTS PURSUANT TO  
42 U.S.C. § 1983

Plaintiff ALEXANDER WILLIAMS JR, repeats, reiterates and realleges each paragraph of this complaint and further alleges:

All the aforementioned acts of the defendants named herein, were carried out under color of State Law.

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All of the aforementioned acts deprived plaintiff ALEXANDER WILLIAMS JR, of rights privileges and immunities guaranteed to citizens of the United States by the FIRST, FOURTH, SIXTH, EIGHTH AND FOURTEENTH AMENDMENT, to the United States Constitution in violation of 42 U.S.C. 1983.

WHEREAS deprivation of the plaintiff's rights were violated without Due Process and that many of the plaintiff's rights were "RESTRICTED" without cause of taken proper safe guards to ensure due process rights were not violated.

AS AND FOR A NINETEENTH CAUSE OF ACTION FOR  
NEGLIGENT TRAINING AND SUPERVISION

Plaintiff ALEXANDER WILLIAMS JR, repeats, reiterates and realleges each and every paragraph of this complaint and further alleges:



The defendant CITY failed to properly and adequately train, supervise, discipline or in any way control the behaviors of the defendants named herein in the exercise of their employment functions, and the failure to enforce the laws of the State of New York and the regulations of defendant CITY & NYC DEP'T CORR, is evidence, of the reckless lack of cautious regards for the rights of the public including plaintiff ALEXANDER WILLIAMS JR, . Further the defendants exhibited a lack of that degree of due care which prudent and reasonable individuals would show.

The failure of defendant CITY to train, supervise, discipline or in any way control the defendants named herein, and in the exercise of their employment functions and the failure of Defendant CITY was carried out willfully, wantonly, maliciously and with such reckless disregard for the consequences as to display a conscious disregard for the danger of harm and injury to the citizens of New York including but not limited to plaintiff ALEXANDER WILLIAMS JR.

AN EXAMPLE OF THIS FAILURE BY DEFENDANT city, eric adams AND louis molina, thomas griffin AND ac miller IS AS FOLLOWS:

- (A) DEFENDANT ARE IN CONTROL OF THE DAY TO DAY OPERATIONS OF ALL CITY JAILS AND YET DEFENDANTS FAILED TO BE IN ACCORDANCE WITH THE HALT ACT AND PROPERLY ABOLISHED SEGREGATED CONFINEMENT, THEREFORE LEAVING LIABILITY ON ALL CORRECTION OFFICERS WITH THE BELIEF THAT SAID 23/1 HOUSING UNIT ARE LEGAL AND LEGIT.
- (B) DEFENDANT ARE NOT IN ACCORDANCE WITH TRAINING CO'S WITH DEFENDANT CITY RULES AND REGULATION STATED IN 40 RCNY § 1-16(E)(1) WHICH STATES: CORRECTION OFFICERS ASSIGNED TO SPECIAL HOUSING UNIT SHALL RECEIVE (40) HOURS OF SPECIAL TRAINING DESIGNED TO ADDRESS THE UNIQUE CHARACTERISTICS OF SUCH A HOUSING UNIT AND ITS INMATES. SUCH TRAINING SHALL INCLUDE, BUT SHALL NOT BE LIMITED TO, RECOGNITION AND UNDERSTANDING OF MENTAL ILLNESS AND DISTRESS, EFFECTIVE COMMUNICATION SKILL AND CONFLICT DE-ESCALATION TECHNIQUES.
- (C) THE DEFENDANT DID NOT TRAIN CORRECTION OFFICERS ASSIGNED TO PLAINTIFF'S HOUSING UNIT AND THAT DEFENDANT CITY FAILED IN 40 RCNY § 6-16 --- 6-19 ADDRESSING TRAINING FOR RESTRICTIVE HOUSING UNIT IN THAT STAFF ASSIGNED TO RESTRICTIVE HOUSING UNITS SUCH AS THE UNIT PLAINTIFF IS HELD IN, SHALL RECEIVE TRAINING DESIGNED TO ADDRESS THE UNIQUE CHARACTERISTICS AND OPERATIONS OF THESE UNITS AND THE PEOPLE IN CUSTODY WHO ARE HOUSED IN THESE UNITS. SUCH TRAINING SHALL INCLUDE BUT NOT LIMITED TO RECOGNITION AND UNDERSTANDING OF MENTAL ILLNESS AND DISTRESS, EFFECTIVE COMMUNICATION SKILLS AND DE-ESCALATION SKILLS.



It is clear and evident that many of the defendants of defendant CITY named herein lacked in training because many of the situation named herein were due to engagement in conduct that defendants would not have engaged in if defendant CITY better trained, supervised or disciplined its servant, agents, employee in the function of their employment.

There should never be a misunderstanding in whether an inmate has the right to practice/engage in whatever religious belief that they may choose, there should never be a policy or a misunderstanding that restrict or disregard an inmate religious diet that is a known practitioner of that belief and religion, there should never be any confusion as to whether an inmate that is housed by a judge's order of 23/1 (1) hour recreation being mandatory could be restricted without NOTICE or without the issuance of an infraction or for punitive retaliatory reason, there should never be any misunderstanding as to whether court order lockdown and the BOX/SHU are different or one and the same, correction officer should never not know that they can not intrude, listen, monitor an inmate's mail, legal calls and video call with an attorney .

It is clear that correction officer, captains named herein did not have the correct training or otherwise did not care to have the correct training to be assigned to the plaintiff's housing unit to ensure that the plaintiff's and others alike rights were not violated.

As a result of defendant CITY failure to TRAIN SUPERVISE and or DISCIPLINE defendant named herein that were employee, servant and agents of defendant CITY, the plaintiff ALEXANDER WILLIAMS JR, rights were egregiously violated and that he suffered pain and violation that are irreparable in nature.

AS AND FOR A TWENTIETH CAUSE OF ACTION FOR  
RESPONDEAT SUPERIOR

Plaintiff ALEXANDER WILLIAMS JR, repeats, reiterates and realleges each paragraph of this complaint and further alleges:

The defendants CITY & ERIC ADAMS is vicariously liable for the acts of defendants LUOIS MOLINA and other named herein this complaint as followed : THOMAS GRIFFIN, AC MILLER, WARDEN COLLIN, WARDEN CORT, DW FLEEMING, DW JONNELL SHIVRAJ, WARDEN JEAN RENNE, JOANN MATOS, TIFFANY MORALES, LISA BARNBEY, DW MILLER, ADW GWINNE FORM CIB, CAPT MATHIS, CAPT FLUKA OF CIB, CAPT LOPEZ, CAPT JOSEPH, CAPT PALMERO, CAPT RIVERA (GRVC), CAPT RIVERA (ESU), CAPT VEST 28 (ESU), CAPT GAUN (GRVC), ERICA GAINOUS, KEVIN YOUNG, KEVIN WHITE, PRESTON RITTER, RAHMAN, MARDEN, RODRIUGEZ, ANTONIO GRAVES, ESU OFFICER RICHARDSON, ANDREW HICKSON, BAWA, WOLOSKI, HO, ESU SECRETARY 4190, CIB OFFICER (WHITE DIRTY BLOND HAIR 5'5 HEIGHT), ANDERSON, RECREATION CAPT FROM JAN 7, 2023, SRT OFFICERS 1, 3, 4, 139, 182, 65, 74, 75, 78, 79, 80, 88, 82, 182, 111, 112, 113, 117, 135, 120, 102, 203, K-9 OFFICER PERPIGNAN, CO ORELLANA (HQ), who were all acting in the scope of their employment when they engaged in the wrongful conduct described herein; such as the failure to adhere to the HATH ACT, ABIDE BY THE JUDICIAL LOCKDOWN ORDER OF (1) HOUR MANDATORY DAILY, ABIDE BY THE DUE PROCESS RIGHTS OF PLAINTIFF AND ALIKE DETAINEES, ABIDE BY THE FREEDOM OF RELIGIOUS PRACTICE, ABIDE BY THE CONFIDENTIALITY OF ATTORNEY CLIENT PRIVILEGE, ABIDE BY THE TERMS OF THE NUNEZ SETTLEMENT IN THAT CAMERAS SHOULD HAVE NOT BEEN RECORDING PLAINTIFF WAS SHOWERING USING TOILET OR SLEEPING , ABIDE BY MEDICAL POLICIES STATED HEREIN and more, and that each of these defendants engaged in conduct that constituted a violation of the plaintiff's Constitutional rights.

Defendant LOUIS MOLINA is vicariously liable for the acts of the DOC officials named herein holding a lower rank than COMMISSIONER who were on duty and acting in the scope of their employment when they engaged in the wrongful conduct described herein.

Defendants WARDEN JEAN RENEE and WARDEN CORT is vicariously liable for the conduct and the creation of CLO 13/21 as seen herein as EXHIBIT- and EXHIBIT-35 and that said CLO in 370.20 was already established by the court to have violated the rights of the plaintiff and others alike in many areas stated therein this complaint, and that Defendants LISA BARNBEY , TIFFANY MORALES, JONNELL SHIVRAJ AND JOANN MATOS, should have known better to endorse and/or assist in the creation of any Command Level Order when neither defendants

holds the position as a final-policy maker for the defendant CITY and that Defendant CORT when had the opportunity not to enforce said policy and restrictions listed in EXHIBIT- A failed by not stopping the enforcement of said policy as well.

Defendant JEAN RENEE and WARDEN CORT and WARDEN COLLIN are vicariously liable for the misconduct and acts of the defendants holding a RANK lower than warden who were acting in the scope of their duty when they engaged in the wrongful conduct described herein, and that each defendant engaged in such conduct that constituted a violation of that plaintiff rights.

Defendant ERIC GAINOUS is vicariously liable for the acts of the employees and agents who worked under her supervision such as ANTONIO GRAVES, ANDREW HICKSON, PRESTON RITTER, KEVIN YOUNG, KEVIN WHITE, who engaged in such conduct that violated the plaintiff rights and that defendant ERIC GAINOUS as the security captain failed to supervise, train and discipline those defendant in the scope of their duties and skills of understanding the in's and out's of such a special housing unit such as the RESTRICTIVE housing unit that the plaintiff was held in.

Defendant DW MILLER<sup>and Warden COLLINS</sup> is vicariously liable for the acts of the defendant who were acting in the scope of their employment when they engaged in the wrongful conduct described herein that took place at the WEST FACILITY jail being that defendant DW MILLER is the security deputy warden of said WEST Facility.

Defendants LOPEZ 462, MATHIS 82, SRT 1, SRT 3, AND SRT 4, is vicariously liable for the acts of the SRT officers who were acting and/or engaging in wrongful conduct while under their watch and supervision and the defendant CAPT LOPEZ, MATHIS SRT 1, SRT 3, AND SRT 4 failed to supervise, stop, or discipline these defendant for their misconduct that lead to the violation of the rights of the plaintiff ALEXANDER WILLIAMS JR.

AS AND FOR A TWENTY FIRST CAUSE OF ACTION FOR  
UNLAWFUL IMPRISONMENT PURSUANT TO 42 U.S.C. § 1983

Plaintiff ALEXANDER WILLIAMS JR, REPEATS, REITERATES AND REALLEGES EACH PARAGRAPH OF THIS COMPLAINT AND FURTHER ALLEGES:

Defendants engaged in conduct that knowingly, willingly and purposefully ignored and disregarded the HALT ACT which led to the plaintiff's illegal and unlawful imprisonment in 23/1 solitary confinement housing unit which was adverse and against New York State and New York Correction law as seen herein EXHIBIT-26.

Defendant should have known that a sitting judge did not have the authority to issue such an order and that since in plaintiff's case when such order was issued in Dec of 2018 which was prior to passing of HALT ACT in January 2021 that the proper course of action to take was to seek guidance from Court system through DOC / COURT liaison for clarification of moving forward after the passing of HALT ACT in January of 2021 and/or for modification of plaintiff JLO to align with the criteria of the HALT ACT

Defendant CITY was placed on notice in the matter of the plaintiff's illegal RESTRICTED housing situation in ALEXANDER WILLIAMS JR V. CITY OF NEW YORK ET AL, 21-CV-1083 (PGG)(KHP)

& ALEXANDER WILLIAMS JR V. CITY OF NEW YORK ET AL, 22-CV-3819(PGG)(KHP) WHERE DEFENDANT CITY WAS NAMED IN BOTH MATTERS AND THE CORE WITHIN EACH MATTER WAS THE HOUSING PLACEMENT AND THE CONDITION OF SAID PLACEMENT AND DEFENDANT city ARGUED THAT SAID PLACEMENT WAS CORRECT AND OTHERWISE LEGAL IN THEIR RESPONSE AND SUCH TOOK THE POSITION AGAINST THE BILL SEEN HEREIN EXHIBIT-26.

Defendant CITY and others named herein were aware of the injuries and mental affect that the unlawful imprisonment had on the plaintiff as seen herein EXHIBIT-H, see also EXHIBIT-R and EXHIBIT-S displaying that the mental damage of the plaintiff was indeed worsening the more time spent under the unlawful confinement and that plaintiff on more than two occasions attempted to take his life due to the UNLAWFUL IMPRISONMENT enforced by the defendant CITY and others named herein

The plaintiff ALEXANDER WILLIAMS was conscious and did not consent to the unlawful imprisonment and did suffer injuries that irreparable in nature.



AS AND FOR A TWENTY SECOND CAUSE OF ACTION  
FOR MUNICIPAL LIABILITY

Plaintiff ALEXANDER WILLIAMS JR, REPEATS RETTEREATES AND REALLAGES EACH AND EVERY PARAGRAPH OF THIS COMPLAINT AND FURTHER ALLGES:

Defendants CITY, JEAN REENE, WARDEN ~~KEXXCORT~~, JOANNE MATOS, JONELL SHIVRAJ, TIFFANY MORALES, LISA BARNBEY, did create endorse and enforce a custom, usgage ,practice, procedure and rule and maintain such polciy as seen herein as EXHIBIT-A and EXHIBIT-35 in CLO 13/21 in a matter that has already been ruled on by Magistrate Judge Katherine H. Parker and District Judge Pual G. Gardephe in this southern district to at minimum violate the rights of court order inmates in the ares of (1) RELIGIOUS RESTRICTION AND RELIGIOUS TEXT ; (2) DUE PROCESS VIOLATION WITH ENAHONE RESTRAINT, yet the defendnat maintain and created a new polciy that mirrored word for the ploicy that was deemed unconstitutional . See FLORES V. CITY OF NEW YORK , 2022 U.S. DIST LEXIS 179347, 2022 WL 4592892 (S.D.N.Y. SEPTEMBER 30, 2022) ; ALSO ANDUZE V. CITY OF NEW YORK 2022 U.S. DIST LEXIS 177927, 2022 WL 4547420 (S.D.N.Y. SEPTEMBER <sup>29</sup> 9, 2022).

The polciy that was the core of the Court finidng in those cases can be seen herein as EXHIBIT-12 and the polciy that is plaintiff attention in this section of the MUNICIPAL liability can be seen herein as EXHIBIT-A. When the court compare the two plocies seen in EXHIBit-12 and EXHIBIT-A the Court will find that the two are the same word for word with the only diffrence being date and CLO numbers.

Defendants TIFFANY MORALES, JOANNE MATOS, LISA BARNBEY AND JONNELL SHIVRAJ was not found to be liable in the cases mentioned above because as SEEn in EXHIBIT-12 those defendants did not sign CLO 370.20 giving them legal plausible deniability in the matter. But as seen herein in EXHIBIT-A these defendants TIFFANY MORALES, JONNELL SHIVRAJ, JOANN MATOS, LISA BARNBEY did sign CLO 13/21 , indicating that these defendnats this time around played a role in the ceration and enforcemnt of said plociy, whihc is also enforced under the governing of defendant WARDEN CORT.

In that defendants CITY, JEAN RENEE, WARDEN CORT, TIFFANY MORALES, JONNELL SHIVRAJ, JOANNE MATOS, LISA BARNEEY, while acting under color of State law engaged in conduct that constituted a Custom, Usage, Practice, Procedure or rule of the respective MUNICIPALITY/ AUTHORITY which is forbidden by the Constitution of the United States, In that restriction to medical and to be seen in facility clinic area as stated in EXHIBIT-A pages 4-6 violates that plaintiff right to adequate medical care and leads to plaintiff being medicated versus examined when he informs doctors on medical issues such as pains and other medical complaints alike because GRVC does not maintain an area that fits the criteria of a treatment area by NYS and NYC medical statutes that the plaintiff and court order inmates could be examined at outside of the facility which policy restricts plaintiff from.

And that plaintiff supreme court JLO does not restrict plaintiff from medical as seen herein EXHIBIT -F and that further defendant CITY was informed in October 26, 2022 by Board of Correction director of policies and communication after he sought clarification from the court that DOC must adhere to the restriction of the JLO while still affording the plaintiff minimum standards and specifically stated that DOC must not use DOC policies as a blanket but to address each court order inmate separately by the restriction listed in their JLO as seen herein in EXHIBIT-43, which supports that restricting any inmate from the facility medical clinic area is not normal or proper under DOC correction law and policies.

And that EXHIBIT-A was and is the cause of the plaintiff cause of action of Due Process violation and the direct and proximate cause of the injuries sustained from such custom, usage, practice procedure and rule where as the plaintiff was never afforded NOTICE and / or HEARING labeling him ENHANCE restrain and furthermore EXHIBIT-J herein clearly states that ERS set up is to only be used on plaintiff when leaving outside of the facility, and that this custom was used as a blanket enforced against all court order inmates even though each was not Enhance Restraint and even though defendants including CITY was forewarned by EXHIBIT-43 of the possible violations it presented ahead of time.



Defendnat CITY, JEAN RENEE, WARDEN CORT, TIFFANY MORALES, JOANNE MATOS, JONNELL SHIVRAJ, LISA BARNBEY, by way of this Custom Polciy, Practice, Usage Procedure and rule of defendnat CITY, that lead to the plaintiff denial of medical care at BELLVUE hsopital on post-opt surgery on OCTOBER6, 2022 whihc was the same polciy that played a role in the plaintiff gallbladder removal that was delaayed until Magistrate Jusge Katherine H. Parker got involved as seen in EXHIBIT-b, this was even after counsel for the defendant CITY informed United states Magistrate judge that the plaintiff was till not produce on September 15, 2022 and was only produced after plaintiff suffered yet another gallbladder attack on that same date at 5:00pm that lead to plaintiff vomiting, being unable to walk, being in serve pain as seen in EXHIBIT-G for a copy of this correspondance.

Defendnat CITY JEAN RENNE TIFFANY MORALES, WARDEN CORT, LISA BARNBEY, JONNELL SHIVRAJ AND JOANNE MATOS, while working and acting under color of State law engaged in a conduct that constituted a Custom, Polciy, Usage, Practice, Procedure or rule of the respective MUNICIPALITY/ AUTHOIRTY that concluded in plaintiff ands others alike being siubjected to 23 hours amny days 24 hours solitary confinement without a tevelivions of anything in their cell after the passing of the HALT Act that abolihsed such a classification and that limited defendnat CITY, DOC, WARDEN CORT, JEAN RENEE, LISA BARNBEY, JOANNE MATOS, TIFFANY MORALES, JONNELL SHIVRAJ to only being able to confien inmates in a cell for no more than 17 hours a day.

The defendnat owed the plaintiff the duty to follow, know better and/or seek guidance and clarification in regards to the HALT act and other restiction listed in EXHIBIT-A instead of enforcing such customs, practcies, usages, proecures blindly without due care.

Defendant CITY, WARDEN JEAN RENEE, WARDEN CORT, TIFFANY MORALES, JONNELL SHIVRAJ, JOANN MACTOS, LISA BARNBEY, should have known, or should know that a Judges order andthat the contrniunac of a 23 hour lockdown was against Correction Law and that a Judge can not supercede state and Correction law and that the restriction that they enaged in enforcing was a CUSTOM that violated the plaintiff alexander williams jr, 4 rights and inmates alike

that were housed in court order lockdown status.

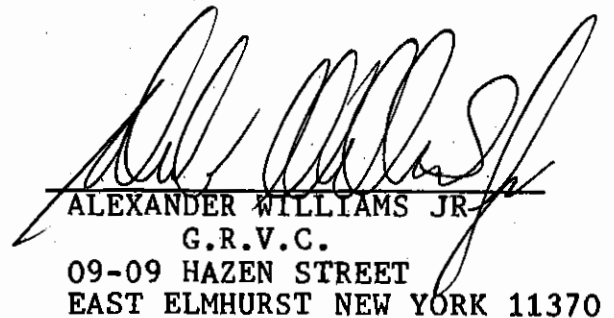
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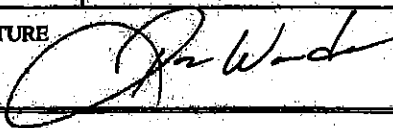
Along with the declatory relief stated herein the aplintiff ALEXANDER WILLIAMS JR, is entitled to compensatory damages in the sum of One Million Dollars (\$1,000,000) and is further entitled to Two Million Dollars in punitive damages (\$2,000,000)

WHEREFORE plaintiff ALEXANDER WILLIAMS JR, demands judgement jointly and servereally in the total sum of Three Million Dolars collectively for compensation and punitive damages plus reasonable filing cost and disburstment fee in this matter.

DATED : FEBHAURY 1, 2023  
QUEENS NY 11370

  
ALEXANDER WILLIAMS JR  
G.R.V.C.  
09-09 HAZEN STREET  
EAST ELMHURST NEW YORK 11370

# EXHIBIT –A

	CORRECTION DEPARTMENT CITY OF NEW YORK			
	GEORGE R. VIerno CENTER			
	COMMAND LEVEL ORDER			
ORDER NUMBER: <b>#13/21</b>	SECTION: <b>SECURITY</b>	<input checked="" type="checkbox"/> NEW <input type="checkbox"/> REVISED	SUBJECT: COURT ORDERED LOCKDOWN INMATES	AREAS <b>ALL STAFF</b>
EFFECTIVE DATE: <b>07/19/21</b>	<input type="checkbox"/> ADMINISTRATION <input type="checkbox"/> PROGRAMS <input checked="" type="checkbox"/> SECURITY	PAGE 1 OF 6	REFERENCE: Facility Generated	
AUTHORIZED BY THE COMMANDING OFFICER <b>JEAN RENE, WARDEN</b>		SIGNATURE 		

**I. PURPOSE**

This command level order is to establish policy and procedures for the Care, Custody and Control of the inmates under Court Order lockdown status.



**II. POLICY**

It shall be the policy of the George R. Vierno Center to comply with the mandates of all Court Orders dealing with inmates housed in this facility. Additionally, the restrictions imposed on "Lockdown Status" inmates by the Court supercedes any rights these inmates may ordinarily have under the Minimum Standards.

**III. PROCEDURES**

The inmates housed in Court Ordered lock-down areas shall be governed by the following:

- a. Twenty-three (23) hour lock-in, feed -in status.
- b. Inmates housed in Court Ordered Lock-Down areas will be allowed to possess the following property in their cell:
  1. One (1) Bible
  2. Three (3) Magazines
  3. Three (3) Books
  4. One (1) Bar of Soap
  5. One (1) Container of Shampoo
  6. One (1) Toothbrush
  7. One (1) Toothpaste
  8. One (1) Plastic Cup
  9. One (1) Towel
  10. Deodorant

	<b>CORRECTION DEPARTMENT CITY OF NEW YORK</b>		<b>GEORGE R. VIerno CENTER</b>	
	<b>COMMAND LEVEL ORDER</b>		<b>ORDER NUMBER # 13/21</b>	
	<b>EFFECTIVE DATE: 07/19/21</b>	<b>SUBJECT: COURT ORDERED LOCKDOWN INMATES</b>	<b>PAGE 2 OF 6 PAGES</b>	

#### IV. PROCEDURES (CONTINUED)

##### Special Security Procedures



- a. Inmates in lock-down status shall not be removed from their cells unless a Captain is present. AT NO TIME WILL MORE THAN ONE (1) INMATE BE ALLOWED OUT OF HIS CELL AT ANY ONE TIME.
- b. Whenever a Court Ordered Lock-Down inmate is removed from the housing area, he shall be restrained in leg irons, waist chains and mitts. The inmate shall be under one-on-one observation of a Correction Officer to assure no communication with any other inmate(s), verbally, in writing or through hand signs.
- c. During the day tour (0700x 1500 hours) and under the supervision of a Captain these inmates shall be strip-searched, and their property carefully searched daily. These searches will be recorded on a Random Search Form.
- d. Inmates shall always dress in jumpsuits, unless going to court for trial.
- e. Inmates housed in Court Ordered Lock-In areas shall not be allowed to refuse to be produced in court.
- f. The Court Ordered inmates shall not be permitted to refuse to attend court because of complaints of health problems unless the physician examine this defendant certifies in writing that the attendance of this defendant in court would likely result in serious impairment to this defendant's health. In this event, this information shall be immediately transmitted to the Central Operations Desk at (718) 546-1384.
- g. The Court Ordered inmate's accompany card shall be kept in the CMC box in the General office.

##### Program /Inmate Services

###### Law Library/Outgoing Mail

Inmates will make all request for Law Library materials in writing. These requests will be forwarded to the Security Office who will obtain copies of the requested materials and place same in the inmate's blue storage bin.

1. The assigned Captain will collect all letters written by the inmate. The Captain will turn the mail over to the Security Office. Under no circumstances will any inmate in Court Ordered Lockdown status be permitted to send out any written correspondence or any other type of communication.

	<b>CORRECTION DEPARTMENT CITY OF NEW YORK</b>		<b>GEORGE R. VIerno CENTER</b>	
	<b>COMMAND LEVEL ORDER</b>		<b>ORDER NUMBER # 13/21</b>	
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**V. PROCEDURES (CONTINUED)****Telephone Calls and Visit Privileges:**

1. The court ordered inmates are barred from Visits and Telephone calls to anyone other than their attorney of record. These numbers are listed in each inmate's court order folder.
2. All calls will be placed between the hours of 1330-1430 hours and 1630-1730 hours.
3. The Correction Officer assigned to the post shall make the telephone call using a P.I.N. Number which will be changed weekly by Security. Inmates are not allowed to know the P.I.N. numbers. The Correction Officer shall maintain a log of each attorney called. Such a log will detail the following information for each attempted call:
  - a. Date and Time call requested
  - b. Time call was placed
  - c. Whether or not contact was made with the Attorney
  - d. Time call ended.

**Inmate Showers**

Inmates will be afforded a ten-minute shower, a day. The showers are to be recorded in a shower logbook. As stated earlier, a Captain shall be present when the inmate is removed from his cell to the shower and again when he is returned from the shower to his cell. All shower activity shall be logged in the Housing Area Logbook.

**Incoming Mail**



Any incoming mail for inmates housed in court ordered areas will be forwarded to the GRVC Security Office. No mail shall be forwarded to these inmates until approved by the Commanding Officer or his/her designee.

**Commissary**

The only items inmates housed in court ordered areas may purchase from commissary are:

- |              |               |
|--------------|---------------|
| 1. Soap      | 4. Toothpaste |
| 2. Shampoo   | 5. Paper      |
| 3. Deodorant |               |



	<b>CORRECTION DEPARTMENT CITY OF NEW YORK</b>		<b>GEORGE R. VIerno CENTER</b>	
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## VI. PROCEDURES (CONTINUED)

Custodial staff assigned to the housing area will complete the Commissary request form for the inmate. This shall prevent subject from communicating with commissary help. All commissary products will be thoroughly searched prior to giving them to the intended inmate. Appropriate logbook entries shall be made relative to the delivery of this service.

### Social Service

All request for Social Services shall be forwarded to the Security Office. At no time will these inmates have any contact with Social Service personnel. Additionally, at no time will interview slips be forwarded to any Service area.

### Religious Services

If these inmates request religious services, the Chaplain will be called to visit them. However, the Chaplain will first be instructed that he/she may not:



1. Communicate on the inmate's behalf with anyone other than the Warden, the Security Office, or the Court -appointed Special Master.
2. Convey any written messages from these inmates to anyone else.
3. May not give anything to or receive anything from these inmates.

### Medical/Mental Health Services

Any necessary medical or mental health services are to be provided to these inmates in the housing area. They will not be removed to go to the Clinic unless it is physically impossible to provide them with necessary medical services in the cell/housing area. Mental Health services, if required, will be provided to them in the housing area, not the clinic.

If the inmate must be removed to the Clinic for medical services, he shall be escorted by a Correction officer and a Captain and Kept separate from all other inmates in such a manner as to assure that he is unable to communicate in any manner with other inmates.

Medical Staff who come to see these inmates in the housing area should first be instructed that they may not:

	<b>CORRECTION DEPARTMENT CITY OF NEW YORK</b>		<b>GEORGE R. VIerno CENTER</b>	
	<b>COMMAND LEVEL ORDER</b>		<b>ORDER NUMBER # 13/21</b>	
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**VII. PROCEDURES (CONTINUED)**

1. Communicate on the inmate's behalf with anyone other than the Warden or the Security Office.
2. Convey any written messages.
3. May not give anything to or from these inmates unless the item is necessary to provide medical services (i.e. medical supplies, medication).

**Hospital Runs**

If the inmate requires hospitalization, he is to be treated and outposted at Bellevue Hospital as a medical emergency. In the event of a medical emergency, the inmate is to be transported to the nearest hospital.

**Inmate Recreation**

Inmates housed in the Court Ordered area may be afforded recreation in accordance with the details delineated in the court order or as amended in a separate memo. These stipulations shall be reflected in the posted "Recreation Schedule". A Captain shall be present when the inmate is removed from his cell and returned to his cell, following the recreation period. While at recreation, these inmates shall be separated from all other inmates verbally, in writing or through hand signals. These inmates will be restrained in waist chains handcuffs and mitts whenever they are out of their cells for recreation.



Appropriate logbook entries shall be made relative to delivery of this service.

**CELL AREA ACCESS AND SUPERVISION**

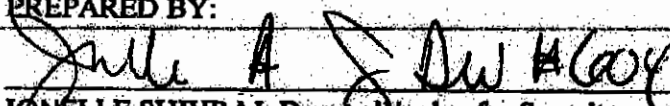
1. Civilian personnel (i.e. Chaplain and Medical Staff) must always enter the cell area accompanied by a Supervisor.
2. The area Captain will conduct at least three (3) tours of inspection in the court ordered inmates cell area during each tour of duty.
3. The on-duty Tour Commander will conduct at least one (1) tour of inspection during each tour of duty. He/she is responsible for ensuring that the provisions of this order are fully complied with.

**LEGAL JUSTIFICATION**

1. This order is justified as per Supreme Court Order.

	<b>CORRECTION DEPARTMENT CITY OF NEW YORK</b>		<b>GEORGE R. VIerno CENTER</b>	
	<b>COMMAND LEVEL ORDER</b>		<b>ORDER NUMBER # 13/21</b>	
	<b>EFFECTIVE DATE: 07/19/21</b>	<b>SUBJECT: COURT ORDERED LOCKDOWN INMATES</b>	<b>PAGE 6 OF 6 PAGES</b>	


PREPARED BY:

  
 JONELLE SHIVRAJ, Deputy Warden for Security

REVIEWED BY:



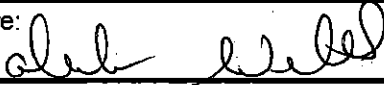
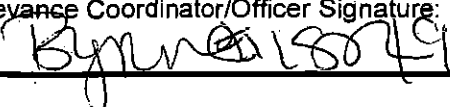
  
 LISA BARNABY, Deputy Warden for Administration

  
 JOANNE MATOS, Deputy Warden for Programs/Operations

  
 TIFFANY MORALES, Deputy Warden for Enhanced Supervision Housing



# EXHIBIT – B

## ATTACHMENT - C

	CITY OF NEW YORK - DEPARTMENT OF CORRECTION		
	OFFICE OF CONSTITUENT AND GRIEVANCE SERVICES		
	DISPOSITION FORM		
Grievance Reference #587271		Date Filed: 09/26/22	Facility: GRVC
Inmate Name: Williams Alexander		Book and Case#: 1411801632	Category: Medical
<p>From OCGS Inmate Statement Form, print or type short description of grievance:</p> <p>I was scheduled for surgery today as seen in the attached documentation and I was not produced nor did I refused.</p>			
<p>Action Requested by Inmate:</p> <p>Please investigate this matter and notify me of outcome of investigation is writing.</p>			
STEP 1: FORMAL RESOLUTION			
<p>Check one box: <input checked="" type="checkbox"/> Grievance      <input type="checkbox"/> Submission is not subjected to the Grievance Process</p> <p>The Office Of Constituent and Grievance Services proposes to formally resolve your grievance as follows below. Alternatively, OCGS staff shall provide an explanation for why the submission is not subject to the OCGS process. Grievances not subject to the Grievance Process cannot be appealed.</p> <p>OCGS staff would like to inform grievant that your requested action will be forwarded to Medical for review.</p>			
CHECK THE APPROPRIATE BOX BELOW AND PROVIDE YOUR SIGNATURE			
(Failure to sign forms will forgo your right to appeal the proposed resolution.)			
<p><input checked="" type="checkbox"/> Yes, I accept the resolution      <input type="checkbox"/> No      <input type="checkbox"/> I request to appeal the resolution of this grievance to the Commanding officer.</p> <p><small>Note: If you appeal, the grievance staff can request for a preliminary based review if they feel the complaint was thoroughly investigated and addressed, prior to forwarding to the Commanding Officer. You will receive the outcome of this review within (3) business days to inform you the appeal will proceed or you exhausted administrative remedies. Grievance not subject to the Grievance Process cannot be appealed.</small></p>			
Inmate's Signature: 		Date: 9/26/22	
<input type="checkbox"/> Preliminary Review Requested			
Grievance Coordinator/Officer Signature: 		Date: 9/26/22	



## ATTACHMENT -B-1

 <b>CITY OF NEW YORK - DEPARTMENT OF CORRECTION</b> 		
<b>OFFICE OF CONSTITUENT AND GRIEVANCE SERVICES</b> <b>INMATE STATEMENT FORM</b>		Form: 7101R-A Eff: 9/14/18 Ref: Dir. 3376R-A
Inmate's Name:	Book & Case #:	NYSID #:
alexander Williams	1411701672	018978586
Facility:	Housing Area:	Date of Incident:
GRVC	2A	9/15/2022
		Date Submitted:
		9/15/2022
<p>All grievances must be submitted within ten business days after the incident occurred, unless it's a sexual abuse or harassment allegation. The inmate filing the grievance must personally prepare this statement. Upon collection by the Office of Constituent and Grievance Services (OCGS) staff, OCGS staff will time-stamp and issue it a grievance reference number. OCGS staff shall provide the inmate with a copy of this form as a record of receipt.</p>		
Grievance: I was Scheduled for Surgery today as seen on the attached documentation and I was not present nor did I refuse		
Action Requested by Inmate: please investigate this matter and notify me of outcome of investigation in writing		
Please read below and check the correct box:		
Do you agree to have your statement edited for clarification by OCGS staff?		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Do you need the OCGS staff to write the grievance for you?		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Have you filed this grievance with a court or other agency?		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Did you require the assistance of an interpreter?		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Inmate's Signature:	Date of Signature:	
<i>Alexander Williams</i>	9/15/2022	
FOR DOC OFFICE USE ONLY  OCGS MUST PROVIDE A COPY OF THIS FORM TO THE INMATE AS A RECORD OF RECEIPT.  THIS FORM IS INVALID UNLESS SIGNED BY THE INMATE AND GRIEVANCE COORDINATOR		
TIME STAMP	Grievance Reference #	Category:
1072 SEP 26 2022	587271	Medical
Office of Constituent and Grievance Services Coordinator/Officer Signature:		
<i>Byrne #18049</i>		





Elmhurst

## AFTER VISIT SUMMARY

Alexander Williams MRN: 6162091

9/1/2022 Elmhurst Adult ED 718-334-3054

## Instructions

PT has chronic cholecystitis with recurrent bouts. Pt **MUST** return on **9/15 at 8am** for appointment. **NEEDS Metronidazole 500mg 3x daily for 10 days and ciprofloxacin 500mg 2x daily for 10 days.**

Please return if chest pain, shortness of breath, trouble breathing, nausea, vomiting, malaise, fever, chills, fatigue, trouble or pain on urination, worsening abdominal pain, diarrhea, blood in stool, any worsening signs or symptoms



## Ambulatory Referral to General Surgery

Scheduled for 9/15/2022

Expires: 2/28/2023 (requested)

Reason for Referral: Cholecystectomy

## What's Next

SEP 15 2022 **Follow Up Visit**  
Thursday September 15 8:40 AM  
(Arrive by 8:20 AM)  
Go to H-building: 2nd floor, Room D2-81

Elmhurst General  
Surgery  
79-01 Broadway  
Elmhurst NY 11373  
718-334-3241  
Arrive at: D2-81

## General Emergency Department Discharge Instructions

We appreciate that you chose us as your healthcare provider.

This form provides you with information about the care you received in our Emergency Department and instructions about caring for yourself after you leave the Emergency Department. If you have further questions concerning this visit please call us at the included phone number above on this form. Please keep this form and bring it with you should you need additional treatment. If your symptoms become worse or you are not improving as expected and you are unable to reach your usual health care provider, or get to your follow-up appointment, you should return to the Emergency Department immediately. We are available 24 hours a day.

*It is important that you keep appointments that may have been scheduled. If you are unable to make an appointment, please call the corresponding clinic to reschedule your appointment.*

## Today's Visit

You were seen by Dr. L Iavicoli, MD, Dr. A Campeas, MD, and Dr. U Khatri, MD

## Diagnosis

Chronic cholecystitis

## Lab Tests Completed

BMP

CBC and differential

LFT

Lipase

Manual Differential - Sysmex (REFLEX)

## Imaging Tests

US gallbladder

## Done Today

Inpatient Consult to General Surgery

## Medications Given

ceFAZolin (ANCEF)

ketorolac (TORADOL) Last given at 6:29 AM

metroNIDAZOLE (FLAGYL)

sodium chloride Stopped at 8:23 AM



MY CHART

Our records indicate that you do not meet the minimum age required to sign up for MyChart.

Parents or legal guardians who would like online access to Alexander's medical record via MyChart should request access via Proxy from your clinic staff or local Health Information Department.

Need help signing up for MyChart? Call our MyChart Help Line at 1-844-920-1227 and press 1 for MyChart assistance. Our team is available Monday - Friday, 9:00 AM - 5:00 PM ET.

## NYC Health and Hospital Virtual ExpressCare (continued)

Visit [Expresscare.nyc](https://expresscare.nyc) or call (631) 397-2273 or point your smartphone camera at the QR code to talk to a doctor now.



## Don't wait any longer! Protect yourself and others against COVID-19!

NYC Health + Hospitals is committed to help New Yorkers fight the COVID-19 pandemic. One of the most powerful tools to end the COVID-19 pandemic are vaccines. By getting vaccinated, you are protecting yourself, your family, your coworkers, and your community. Being vaccinated will prevent you from:

- Getting COVID-19
- Becoming seriously ill or dying due to COVID-19
- Spreading COVID-19 to others

Once vaccinated, you will add to the number of people in the community who are protected. This will help us to reach herd immunity - when a large part of the community becomes immune (protected from) COVID-19. This makes it harder for the disease to spread.

### COVID-19 vaccines are safe, free and effective!

NYC Health + Hospitals has been using Pfizer, Moderna and J&J vaccines. All three vaccines have been given Emergency Use Authorization (EUA) by the Food and Drug Administration (FDA) in United States. These vaccines have been carefully studied both before and after the FDA's EUA. The vaccines have shown virtually no significant or long-term problems.

In a study of more than 17 million people who received Pfizer or Moderna vaccines:

- Serious allergic reactions happened at a rate of only 2-4 per 1 million doses. This is safer than almost all medicines!

### There are many ways to get your COVID-19 vaccine!

Anyone age 12 and older that lives in the United States can get the COVID-19 vaccine in New York City. To get your vaccine, you can:

**1. Schedule an appointment online.** Go to <https://tinyurl.com/NYCHHCovidVaccine> or use the QR code below on your phone:



### COVID-19 Message

For the latest information from NYC Health + Hospitals about the outbreak of respiratory illness caused by the coronavirus known as COVID-19, go to <https://www.nyhealthandhospitals.org/healthtips/what-you-need-to-know-about-the-coronavirus/>

If you have a fever, cough, sore throat, or shortness of breath that is unrelated to an existing condition, or have questions about COVID-19 testing, please call 1-844-NYC-4NYC (1-844-692-4692).

Thank you for being a patient at ELMHURST ADULT ED today. If your prescription was sent to the internal hospital pharmacy, please keep this paper for your records and provide to the pharmacist when you arrive. Thank you again!

**Patient EMPI: 100457149 - For Internal Pharmacy Use Only**



100457149



10100457149

# EXHIBIT –C

ALEXANDER WILLIAMS JR 121-180-1632  
G.R.V.C.  
09-09 HAZEN STREET  
EAST ELMHURST NEW YORK 11370

AUGUST 31, 2022

THE HONORABLE JUDGE KATHERINE H. PARKER  
UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK  
500 PEARL STREET  
NEW YORK, NEW YORK 10007

RE: WILLIAMS VS. CITY OF NEW YORK ET AL.,  
22-CV-3819

Dear Judge Parker:

I represent myself Pro-Se in the above-captioned matter. I write to advise the Court of an extremely troubling event relevant to this case, involving intimidation and threats against myself, that occurred today Wednesday August 31, 2022 at the George R. Vierno Center ("GRVC") on Rikers Island, where I am currently in pretrial detention.

While I recognize that the Court has yet to reach the discovery stage in this matter, (Dkt. 33) in order to prevent the loss or destruction of potentially relevant evidence, I respectfully request that the Court issue an Order demanding that the defendant CITY and the New York City Department of Correction preserve any footage of this event that may exist, as well as the footage from the incident with SRT from July 28, 2022 that occurred inside of his housing unit 2a at GRVC.

Attached is the statement in regards to the events that occurred today and the areas of the cameras that I am asking that the footage be preserved from.

The conduct of the SRT team members today suggest that a causal link exist between the activity in this case or another pending civil case

that is in front of yourself, Judge Gardephe and a seperate matter that is in front of Jugde Lweis J. Liman. In any matter the filing of a Grievance and a law suiot is a protected conduct it is also clear from the statement that DOC officials are willing to try any/all tactics in order to sway the plaintiffs contiunation in civil litigation.

I ask that this Court immedatley serve the requested Order on teh City Of New York and the New York City Department of Correction for any/all video of the incidant that occured on August 31, 2022. Purusnat to go Your Homor's Individual Rule 1, I attempted to reach the counsel for defendnats in this matter John Schemitsch by telephone to confer regardiong this request; I was unable to reach Mr. Schemitsch. Given defendants' opposition to any request in this nature, I am hopeful that the Court will see the impotance of the request in light of the already established factors of the perpensity for retaliation in the following cases at it related to the plaintiff in thsi case, See WILLIAMS V. CITY OF NEW YORK ET AL., 19-CV-3347 also WILLIAMS V. CITY OF NEW YORK ET AL., 21-CV-1083, IN Your Honors' own Report and Recommendations issued on August 05, 2022 as it goes to First Amendment retailaiton claims.

RESPECTFULLY SUBMITTED

ALEXANDER WILLIAMS JR PRO-SE



**E3XHIBIT-A**

STATEMENT OF FACTS:

MONDAY 8/29/2022-

On Monday the plaintiff received information that his Wife Crystal A. Williams had been diagnosed with Breast cancer and he informed mental health personnel that he was not in the right state of mind. See Housing unit 2a logbook page -91, approx 8:00pm.

TUESDAY 8/30/2022-

ON TUESDAY AT APPROXIMATELY 07:10PM CO Serrano Sheild No. 12439 notified captin Guam and mental health staff that the plaintiff was acting erratic and seemed depressed, see housing unit logbook page 94.

WEDNESDAY 8/31/2022 -

At approximately 10:30am Captain Mitchell was escorting the plaintiff to mental health in the clinic, as the plaintiff was walking out of the housing unit gate in the hallway outside of the housing unit SRT being lead by a Captian Fernandez appeared at the front of the gate and began telling the plaintiff to back up he was not going anywhere right now.

Captain Mitchell as well as the plaintiff himself voiced to SRT captian Fernandez and SRT members that the plaintiff was having a mental health episode and had ben summoned to the facility clinic area to met with mental health personnel.

Ignoring the information that a DOC captian gave to them SRT memebbers demanded that the hallway gate be opened and when it was advanced towards the plaintiff in a theratening manner while screaming under their masks that "I KNOW YOU " " YOU ARE THE GUY WITH THE LAWSUIT, AM GOING TO FUCK YOU UP TODAY".

It is important to note, that the SRT member that made this statement was 6'5 in hieght and was the only one that appeared to have dreadlocks . He nor any of the other SRT team mebers had body worn cameras on, name tags and/or shiled numbers, nor were they recognizable because of the fact that they all had hats and face mask on .

The plaintiff retreated from these SRT members and went in the direction of housing unit officer Serrano and was calling for him to prevent a physical altercation from occurring. As the plaintiff got closer to housing unit Serrano Sheild No 12439, he looked back and saw that the SRT member with the dreads was within inches of him with his hands in a striking position, and still talking under his mask about the plaintiff filing a lawsuit and needing to be taught a lesson.

The plaintiff was able to retreat back into his housing unit barely where he contacted his attorney Eric Abrams from Paul, Weiss, Rifkind, Wharton & Garrison LLP and informed him of what had just taken place.

Housing unit officer Serrano stayed in the hallway section and explained to the SRT captain, Captain Fernandez that what had just taken place was wrong and improper for an inmate that was having a mental episode, (SPEAKING IN REGARDS TO THE PLAINTIFF ALEXANDER WILLIAMS JR).




Housing Unit officer Serrano placed something in the housing unit log book relating to the plaintiff mental health matter see page 96 time 11:00am.

SINCERELY:

ALEXANDER WILLIAMS JR

# EXHIBIT –D

# EXHIBIT – E

	THE CITY OF NEW YORK DEPARTMENT OF CORRECTION			
	GEORGE R. VIerno CENTER			
	WARDEN'S MEMORANDUM			
DISTRIBUTION: <b>ALL STAFF</b>	MEMO NO. <b>31/20</b>	Effective Date: <b>11/19/20</b>	PREPARED BY (Type Name & Title) <b>SHERMA DUNBAR, WARDEN</b>	
SUBJECT: <b>COURT ORDERED LOCKDOWN INMATES HOUSING AREA 2 A</b>			Page 1 of 1 	

**EFFECTIVE IMMEDIATELY**

Effective immediately the following will be strictly adhered to:

When affording services to all inmates housed in 2A which is specific to Court Ordered Lockdown incarcerated individuals, staff **MUST** activate their Body Worn Camera to ensure all services are being provided.

All services provided to inmate Williams, Alexander B&C#141-18-01632 housed in special housing are 2A "Court Ordered Lockdown" must be memorialized for record keeping. Each housing area Officer assigned to housing area 2A or service Officer affording services in housing area 2A **MUST** activate their assigned Body Worn Camera when affording any Service to inmate Williams, Alexander.

**All staff must denote all services afforded in the housing area logbook, copies of the logbook will be required to be scanned daily along with the completion of the attached Excel Grid memorializing which BWC was activated to record services rendered, which shall coincide with the logbook pages**

Any question concerning the contents of this memorandum shall be directed to the Commanding Officer.

**Failure to comply with the contents of this memorandum WILL result in disciplinary action.**

c: Jonelle Shivraj, Deputy Warden, Security  
Tiffany Morales, Deputy Warden, Administration/Programs  
Joanne Matos, Deputy Warden, Operations  
All Tour Commanders



# EXHIBIT – F

**SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF KINGS: CRIMINAL TERM, PART 7**

\_\_\_\_\_  
**THE PEOPLE OF THE STATE OF NEW YORK,**

**LOCKDOWN ORDER**

- against -

**ALEXANDER WILLIAMS,  
BOOK & CASE # 1411801632  
NYSID # 01897858L**

**Kings County  
Indictment Number  
2146/18**

**Defendant.**  
\_\_\_\_\_X

WHEREAS the above-captioned defendant is before the Supreme Court, Kings County, PART 7 pending trial in the above-captioned case, wherein he is charged with Murder in the Second Degree, and other related charges, and

WHEREAS this Court has been presented with clear and convincing evidence that this defendant, has solicited the aid of other persons to threaten, intimidate, and cause serious physical injury or death to witnesses, and has been engaging in other conduct that raises serious, well-founded and legitimate concerns, that he poses a continuing, significant risk to the safety of persons whom he perceives as being potential witnesses against him; and this Court finds that the imposition of each of the restrictive conditions of confinement on this defendant that are delineated in this order is essential to protect the integrity of the criminal proceedings against him and others and to assure the safety of potential witnesses and their families, and is required in this case. It is

**ORDERED** that pending further written order of this Court or another court of appropriate jurisdiction:

**Housing**

- 1) The above-captioned defendant is to be housed in a highly secure area designated by the Department of Correction, preferably the lockdown area, on lock-in, to be separated from all other inmates in the area, in such a manner as to prevent him, to the extent possible, from communicating with or passing material to other inmates,

**Visits and Phone calls**

- 2) Defendant is barred from having any visits other than with his attorney, Jeffrey Chabrowe, Esq.
- 3) Defendant is precluded from making any telephone calls other than to his attorney, Jeffrey Chabrowe, at 917-529-3921. A correction officer or captain shall dial such telephone number 917-529-3921 using the defendant's PIN number. Moreover, the defendant's PIN number shall

Barrett, 917-273-7535. A correction officer or captain shall dial such the telephone numbers 917-529-3921, 516-316-2841, and 917-273-7535 using the defendant's PIN number. Moreover, the defendant's PIN number shall be changed weekly and shall not be given to the defendant. The correction officer or captain placing the call shall verify that attorney Jeffrey Chabrowe, Esq., or investigators Kevin Hinchson, or David Barrett, has answered the phone and, only after verifying that said attorney or investigator is on the line, shall permit the defendant in question to speak on the phone. Additionally, in order to avoid any claim by this defendant that the Department of Corrections has not permitted him to speak with his attorney or investigator in accordance with this order, the Department of Correction will maintain a log of each attorney and investigator call by this defendant, whether completed or not, such log shall detail the following information for each attempted call: a) date and time call requested, b) time call placed, c) whether or not contact was made with the attorney or investigator, 4) the time call ended.

Movement and Transportation


- 4) While in a court detention facility, this defendant will be housed in a similar manner pursuant to paragraph 1.

ORDERED THAT THIS ORDER IS SEALED, copies are to be provided only to the District Attorney of Kings County, the Department of Corrections (DOC) Legal Division, the DOC Operations Security Unit and CCC, the DOC Court Unit, the Warden and Deputy Warden for Security in the jail where the above-captioned defendant is housed, the Commanding Officer of the Brooklyn Court Detention Facility and NYC Correctional Health Services, who shall disseminate by memo to appropriate persons information about the within contained directives which they will be involved in implementing.

SO ORDERED,

Dated: Brooklyn, New York  
February 13, 2019

FEB 13 2019

  
HONORABLE Vincent Del Giudice  
Justice of the Supreme Court

Hon. Vincent M. Del Giudice  
Judge of the Court of Claims  
Acting Supreme Court Justice

# EXHIBIT –G



HON. SYLVIA O. HINDS-RADIX  
Corporation Counsel

THE CITY OF NEW YORK  
LAW DEPARTMENT  
100 CHURCH STREET  
NEW YORK, NEW YORK 10007

NICOLETTE PELLEGRINO  
Assistant Corporation Counsel  
Phone: (212) 356-2338  
Fax: (212) 356-3509  
Email: npellegr@law.nyc.gov

September 14, 2022

VIA E.C.F.

Hon. Katherine H. Parker  
United States Magistrate Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: Alexander Williams, Jr. v. City of New York, et al.,  
22 Civ. 3819 (PGG) (KHP)

Your Honor:

I am an Assistant Corporation Counsel in the Special Federal Litigation Division of the New York City Law Department and an attorney representing defendant the City of New York in the above referenced matter.<sup>1</sup> The undersigned writes in accordance with the Court's September 13, 2022 Order to provide an update concerning the Plaintiff's upcoming medical appointment.

By way of relevant background, on September 13, 2022, the parties participated in a telephone conference before the Court. (See Sept. 13, 2022 Dkt. Entries.) During the conference, Plaintiff noted, *inter alia*, that he was scheduled for a medical appointment this week and expressed concerns regarding whether the New York City Department of Correction ("DOC") would transport him to his appointment. In response, the Court directed the undersigned to contact DOC to confirm (a) when Plaintiff's medical appointment is scheduled for and (b) that DOC has a plan in place to ensure Plaintiff's timely presence at the hospital on that date and time. In addition, the Court directed the undersigned to submit a letter to the Court by today, September 14, 2022, to provide an update concerning this matter.

Thus, as for the requested update, the undersigned was informed that "Williams, Alexander BC #141-18-01632 is scheduled for [a medical] appointment on Tuesday, September 20<sup>th</sup>, 2022." In addition, the undersigned was informed that "unless Plaintiff refuses to go or there's an unforeseen circumstance, there is no reason they will not take him to his [appointment]."

---

<sup>1</sup> This case is being handled, under my supervision, by Assistant Corporation Counsel Mary Jane Anderson, who is not yet admitted to the New York State Bar. Ms. Anderson may be reached at (212) 356-2415 or maanders@law.nyc.gov.

# EXHIBIT – H



NYC  
HEALTH+  
HOSPITALS

## Correctional Health Services

**Patient Name:**

ALEXANDER WILLIAMS

**NYSID:**

01897858L

**Latest Book and Case#:**

1411801632

**Patient Facility:**

GRVC

**ALL - Missed Visit**

Patient: ALEXANDER WILLIAMS DOB: 02/08/1981 Age: 40 Years Old

Book & Case #: 1411801632 NYSID: 01897858L

Facility: GRVC Housing Area: 2A

**Missed Visit Type**

Missed Visit type? Specialty - On-Site

The following services were missed (Specialty): Neurology

**Missed Visit Comments**

Date of scheduled visit? 03/24/2021

What was the reason for missed visit? Not Produced

Signed By: Dwyer, Nadia at 3/25/2021 1:51:08 PM

NYC  
HEALTH+  
HOSPITALS

# Correctional Health Services

**Patient Name:**  
ALEXANDER WILLIAMS  
**NYSID:**  
01897858L

**Latest Book and Case#:**  
1411801632  
**Patient Facility:**  
GRVC

## ALL - Missed Visit

Patient: ALEXANDER WILLIAMS DOB: 02/08/1981 Age: 40 Years Old  
Book & Case #: 1411801632 NYSID: 01897858L  
Facility: GRVC Housing Area: 2A

## Missed Visit Type

Missed Visit type? Nursing

The following services were missed (Nursing): Nursing Services Other

## Missed Visit Comments

Date of scheduled visit? 03/31/2021

What was the reason for missed visit? Not Produced

Missed visit comments: Patient not produced for bloodwork as per officer Sutton referring capt Williams

Signed By: Nelson, Marie at 3/31/2021 7:17:41 AM

NYC  
HEALTH+  
HOSPITALS

# Correctional Health Services

**Patient Name:**  
ALEXANDER WILLIAMS  
**NYSID:**  
01897858L

**Latest Book and Case#:**  
1411801632  
**Patient Facility:**  
GRVC

## ALL - Missed Visit

Patient: ALEXANDER WILLIAMS DOB: 02/08/1981 Age: 40 Years Old  
Book & Case #: 1411801632 NYSID: 01897858L  
Facility: GRVC Housing Area: 2A

## Missed Visit Type

Missed Visit type? Nursing

The following services were missed (Nursing): Nursing Services Other

## Missed Visit Comments

Date of scheduled visit? 04/07/2021

What was the reason for missed visit? Not Produced

Missed visit comments: Patient not produced for bloodwork as per officer Wright referring capt Williams

Signed By: Nelson, Marie at 4/7/2021 7:25:32 AM

NYC  
HEALTH+  
HOSPITALS

# Correctional Health Services

**Patient Name:**  
ALEXANDER WILLIAMS  
**NYSID:**  
01897858L

**Latest Book and Case#:**  
1411801632  
**Patient Facility:**  
GRVC

## ALL - Missed Visit

Patient: ALEXANDER WILLIAMS DOB: 02/08/1981 Age: 40 Years Old  
Book & Case #: 1411801632 NYSID: 01897858L  
Facility: GRVC Housing Area: 2A

## Missed Visit Type

Missed Visit type? Nursing

The following services were missed (Nursing): Nursing Services Other

## Missed Visit Comments

Date of scheduled visit? 04/14/2021

What was the reason for missed visit? Not Produced

Missed visit comments: Pt was not produced by DOC. Capt Guan was notified.

Signed By: Sampeur, Marie at 4/14/2021 7:42:22 AM

NYC  
HEALTH+  
HOSPITALS

## Correctional Health Services

**Patient Name:**  
ALEXANDER WILLIAMS  
**NYSID:**  
01897858L

**Latest Book and Case#:**  
1411801632  
**Patient Facility:**  
GRVC

### ALL - Missed Visit

Patient: ALEXANDER WILLIAMS DOB: 02/08/1981 Age: 40 Years Old  
Book & Case #: 1411801632 NYSID: 01897858L  
Facility: GRVC Housing Area: 2A

### Missed Visit Type

Missed Visit type? Nursing

The following services were missed (Nursing): Nursing Services Other

### Missed Visit Comments

Date of scheduled visit? 04/21/2021

What was the reason for missed visit? Not Produced

Missed visit comments: Pt was not produced by DOC.

Signed By: Sampeur, Marie at 4/21/2021 7:26:26 AM

NYC  
HEALTH+  
HOSPITALS

# Correctional Health Services

**Patient Name:**

ALEXANDER WILLIAMS

**NYSID:**

01897858L

**Latest Book and Case#:**

1411801632

**Patient Facility:**

GRVC

**ALL - Missed Visit**

Patient: ALEXANDER WILLIAMS DOB: 02/08/1981 Age: 40 Years Old

Book & Case #: 1411801632 NYSID: 01897858L

Facility: GRVC Housing Area: 2A

**Missed Visit Type**

Missed Visit type? PsychMeds

The following services were missed (Psych Meds) Psych Medication Re-Evaluation

**Missed Visit Comments**

Date of scheduled visit? 04/22/2021

What was the reason for missed visit? Not Produced

Missed visit comments: Requested to DOC to bring pt to clinic.

Signed By: Otonichar, Joseph at 4/22/2021 5:35:24 PM





# Correctional Health Services

**Patient Name:**  
ALEXANDER WILLIAMS  
**NYSID:**  
01897858L

**Latest Book and Case#:**  
1411801632  
**Patient Facility:**  
GRVC

## MED - Urgicare Call

Patient: **ALEXANDER WILLIAMS** DOB: **02/08/1981** Age: **40 Years Old**  
Book & Case #: **1411801632** NYSID: **01897858L**  
Facility: **GRVC** Housing Area: **2A**

### Urgicare Call:

Urgicare Physician: Adam Litroff DO

Referring MD/PA/NP/RN: Wachtel

Time of Call: 15:02

Evaluation Completed Using: Phone

Chief Complaint: Patient scheduled for WF Sono b/l duplex - Not done. Since Sono unavailable tomorrow, will add to list for Thursday WF Sono.

Category: Medical

Additional Follow-Up Needed? Follow-up by primary care in patient's facility

Signed By: Litroff, Adam at 4/27/2021 8:14:05 PM

NYC  
HEALTH+  
HOSPITALS

# Correctional Health Services

**Patient Name:**  
ALEXANDER WILLIAMS  
**NYSID:**  
01897858L

**Latest Book and Case#:**  
1411801632  
**Patient Facility:**  
GRVC

## ALL - Missed Visit

Patient: ALEXANDER WILLIAMS DOB: 02/08/1981 Age: 40 Years Old  
Book & Case #: 1411801632 NYSID: 01897858L  
Facility: GRVC Housing Area: 2A

## Missed Visit Type

Missed Visit type? Nursing

The following services were missed (Nursing): Nursing Services Other

## Missed Visit Comments

Date of scheduled visit? 04/28/2021

What was the reason for missed visit? Not Produced

Missed visit comments: Patient not produced for bloodwork as per officer Russell referring capt Henry

Signed By: Nelson, Marie at 4/28/2021 8:08:40 AM

**NYC  
HEALTH+  
HOSPITALS**

## Correctional Health Services

**Patient Name:**  
ALEXANDER WILLIAMS  
**NYSID:**  
01897858L

**Latest Book and Case#:**  
1411801632  
**Patient Facility:**  
GRVC

### **ALL - Missed Visit**

Patient: **ALEXANDER WILLIAMS** DOB: **02/08/1981** Age: **40 Years Old**  
Book & Case #: **1411801632** NYSID: **01897858L**  
Facility: **GRVC** Housing Area: **2A**

### **Missed Visit Type**

**Missed Visit type?** Nursing

**The following services were missed (Nursing):** Nursing Services Other

### **Missed Visit Comments**

**Date of scheduled visit?** 05/05/2021

**What was the reason for missed visit?** Not Produced

**Missed visit comments:** Patient not produced for bloodwork as per officer Sutton

Signed By: Nelson, Marie at 5/5/2021 7:27:32 AM



# Correctional Health Services

**Patient Name:**

ALEXANDER WILLIAMS

**NYSID:**

01897858L

**Latest Book and Case#:**

1411801632

**Patient Facility:**

GRVC

**ALL - Missed Visit**

Patient: ALEXANDER WILLIAMS DOB: 02/08/1981 Age: 40 Years Old

Book & Case #: 1411801632 NYSID: 01897858L

Facility: GRVC Housing Area: 2A

**Missed Visit Type**

Missed Visit type? PsychMeds

The following services were missed (Psych Meds) Psych Medication Re-Evaluation

**Missed Visit Comments**

Date of scheduled visit? 05/20/2021

What was the reason for missed visit? Not Produced

Missed visit comments: Requested produce pt but escort reported pt could not be produced

Signed By: Otonichar, Joseph at 5/20/2021 5:40:18 PM



# Correctional Health Services

**Patient Name:**  
ALEXANDER WILLIAMS  
**NYSID:**  
01897858L

**Latest Book and Case#:**  
1411801632  
**Patient Facility:**  
GRVC

## ALL - Missed Visit

Patient: ALEXANDER WILLIAMS DOB: 02/08/1981 Age: 40 Years Old  
Book & Case #: 1411801632 NYSID: 01897858L  
Facility: GRVC Housing Area: 2A

## Missed Visit Type

Missed Visit type? PsychMeds

The following services were missed (Psych Meds) Psych Medication Re-Evaluation

## Missed Visit Comments

Date of scheduled visit? 05/27/2021

What was the reason for missed visit? Not Produced

Signed By: Otonichar, Joseph at 5/27/2021 5:16:19 PM



# Correctional Health Services

**Patient Name:**  
ALEXANDER WILLIAMS  
**NYSID:**  
01897858L

**Latest Book and Case#:**  
1411801632  
**Patient Facility:**  
GRVC

**Form Name:** MH - PsychMeds Bridge  
**Form Obs:** MH - PsychMeds Bridge

## MH - PsychMeds Bridge

**Patient:** ALEXANDER WILLIAMS **DOB:** 02/08/1981 **Age:** 40 Years Old  
**Book & Case #:** 1411801632 **NYSID:** 01897858L  
**Facility:** GRVC **Housing Area:** 2A

### PsychMeds Bridge

**Missed Visit type?** PsychMeds

**The following services were missed:** Psych Medication Re-Evaluation

**Reason patient is being bridged:** Not Produced

**Date of of last Psychiatry Medication Reevaluation::**

MH - Psychiatry - Medication Reevaluation (03/27/2021 6:46:55 PM)

**Percent compliance with individual's medications since last prescription (Type medication name and % compliance):** Abilify 5mg QHS - 100%

melatonin 2mg QHS - 100%

### Current Medications:

HYDROCORTISONE 1% OINTMENT 30 GM 30 GM (HC OINT 30 GM) (HYDROCORTISONE) apply bid;  
Route: EXTERNAL

MICONAZOLE 2% ANTIFUNGAL 30 GM (MICONAZOLE NITRATE) apply bid Route: EXTERNAL

TRIAMCINOLONE NASAL 55 MCG / 1 ML (NASACORT 55 MCG / 1 ML) (TRIAMCINOLONE

ACETONIDE) 1 spray nasally daily; Route: NASAL

ARIPIRAZOLE 5 MG (ABILIFY 5 MG) (ARIPIRAZOLE) take 5 mg by mouth at bedtime

Route: ORAL

MELATONIN 1 MG (MELATONIN) take 2 mg by mouth at bedtime Route: ORAL

ALBUTEROL 90 MCG / 1 INH (VENTOLIN / PROVENTIL HFA 90 MCG / (ALBUTEROL SULFATE) 2 puff

q 6 hours prn; Route: INHALATION

BECLOMETHASONE DIP HFA 80 MCG (QVAR REDHALER HFA 80 MCG) (BECLOMETHASONE

DIPROP HFA) 1 puff bid; Route: INHALATION

### ALL - Missed Visit

**Patient:** ALEXANDER WILLIAMS **DOB:** 02/08/1981 **Age:** 40 Years Old

**Book & Case #:** 1411801632 **NYSID:** 01897858L

**Facility:** GRVC **Housing Area:** 2A

### Missed Visit Type

**Missed Visit type?** PsychMeds

**The following services were missed (Psych Meds)** Psych Medication Re-Evaluation

### Missed Visit Comments

**Date of scheduled visit?** 05/27/2021

**What was the reason for missed visit?** Not Produced



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# Correctional Health Services

**Patient Name:**

ALEXANDER WILLIAMS

**NYSID:**

01897858L

**Latest Book and Case#:**

1411801632

**Patient Facility:**

GRVC

Signed By: Otonichar, Joseph at 5/28/2021 11:04:01 AM

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HOSPITALS

# Correctional Health Services

**Patient Name:**

ALEXANDER WILLIAMS

**NYSID:**

01897858L

**Latest Book and Case#:**

1411801632

**Patient Facility:**

GRVC

**ALL - Missed Visit**

Patient: ALEXANDER WILLIAMS DOB: 02/08/1981 Age: 40 Years Old

Book & Case #: 1411801632 NYSID: 01897858L

Facility: GRVC Housing Area: 2A

**Missed Visit Type**

Missed Visit type? Nursing

The following services were missed (Nursing): Nursing Services Other

**Missed Visit Comments**

Date of scheduled visit? 06/02/2021

What was the reason for missed visit? Not Produced

Missed visit comments: Pt was not produced by DOC.

Signed By: Sampeur, Marie at 6/2/2021 7:36:06 AM



# Correctional Health Services

**Patient Name:**  
ALEXANDER WILLIAMS  
**NYSID:**  
01897858L

**Latest Book and Case#:**  
1411801632  
**Patient Facility:**  
GRVC

## ALL - Missed Visit

Patient: ALEXANDER WILLIAMS DOB: 02/08/1981 Age: 40 Years Old  
Book & Case #: 1411801632 NYSID: 01897858L  
Facility: GRVC Housing Area: 2A

## Missed Visit Type

Missed Visit type? PsychMeds

The following services were missed (Psych Meds) Psych Medication Re-Evaluation

## Missed Visit Comments

Date of scheduled visit? 06/04/2021

What was the reason for missed visit? Not Produced

Missed visit comments: Pt not produced.

Signed By: Otonichar, Joseph at 6/4/2021 12:18:14 PM

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# Correctional Health Services

**Patient Name:**

ALEXANDER WILLIAMS

**NYSID:**

01897858L

**Latest Book and Case#:**

1411801632

**Patient Facility:**

GRVC

**ALL - Missed Visit**

Patient: ALEXANDER WILLIAMS DOB: 02/08/1981 Age: 40 Years Old

Book & Case #: 1411801632 NYSID: 01897858L

Facility: GRVC Housing Area: 2A

**Missed Visit Type**

Missed Visit type? Nursing

The following services were missed (Nursing): Nursing Services Other

**Missed Visit Comments**

Date of scheduled visit? 06/09/2021

What was the reason for missed visit? Not Produced

Missed visit comments: patient not produced for labs: HGBA1C, QFT, RPR and IRON / FERRITIN

Signed By: Quinones, Maritza at 6/9/2021 1:37:40 PM



# Correctional Health Services

**Patient Name:**  
ALEXANDER WILLIAMS  
**NYSID:**  
01897858L

**Latest Book and Case#:**  
1411801632  
**Patient Facility:**  
GRVC

**Form Name:** MH - PsychMeds Bridge  
**Form Obs:** MH - PsychMeds Bridge

## MH - PsychMeds Bridge

**Patient:** ALEXANDER WILLIAMS **DOB:** 02/08/1981 **Age:** 40 Years Old  
**Book & Case #:** 1411801632 **NYSID:** 01897858L  
**Facility:** GRVC **Housing Area:** 2A

### PsychMeds Bridge

**Missed Visit type?** PsychMeds

**The following services were missed:** Psych Medication Re-Evaluation

**Reason patient is being bridged:** Not Produced

**Date of last Psychiatry Medication Reevaluation::**

MH - Psychiatry - Medication Reevaluation (03/27/2021 6:46:55 PM)

**Number of previous consecutive bridges prior to this visit:** 2

**Percent compliance with individual's medications since last prescription (Type medication name and % compliance):** aripiprazole 5mg QHS - 90%

melatonin 1mg QHS - 90%

### Current Medications:

MELATONIN 1 MG (MELATONIN) 1 mg hs Route: ORAL

ARIPIRAZOLE 5 MG (ABILIFY 5 MG) (ARIPIRAZOLE) 5 mg hs; Route: ORAL

ALBUTEROL 90 MCG / 1 INH (VENTOLIN / PROVENTIL HFA 90 MCG / (ALBUTEROL SULFATE) 2 puff q 6 hours prn; Route: INHALATION

BECLOMETHASONE DIP HFA 80 MCG (QVAR REDHALER HFA 80 MCG) (BECLOMETHASONE DIPROP HFA) 1 puff bid.; Route: INHALATION

### New Medications:

MELATONIN 1 MG (MELATONIN) 1 mg hs Route: ORAL

ARIPIRAZOLE 5 MG (ABILIFY 5 MG) (ARIPIRAZOLE) 5 mg hs; Route: ORAL

## ALL - Missed Visit

**Patient:** ALEXANDER WILLIAMS **DOB:** 02/08/1981 **Age:** 40 Years Old  
**Book & Case #:** 1411801632 **NYSID:** 01897858L  
**Facility:** GRVC **Housing Area:** 2A

### Missed Visit Type

**Missed Visit type?** PsychMeds

**The following services were missed (Psych Meds)** Psych Medication Re-Evaluation

### Missed Visit Comments

**What was the reason for missed visit?** Not Produced

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# Correctional Health Services

**Patient Name:**  
ALEXANDER WILLIAMS  
**NYSID:**  
01897858L

**Latest Book and Case#:**  
1411801632  
**Patient Facility:**  
GRVC

Signed By: Otonichar, Joseph at 6/10/2021 3:45:47 PM



**NYC  
HEALTH+  
HOSPITALS**

# Correctional Health Services

**Patient Name:**  
ALEXANDER WILLIAMS  
**NYSID:**  
01897858L

**Latest Book and Case#:**  
1411801632  
**Patient Facility:**  
GRVC

## **ALL - Missed Visit**

Patient: **ALEXANDER WILLIAMS** DOB: **02/08/1981** Age: **40 Years Old**  
Book & Case #: **1411801632** NYSID: **01897858L**  
Facility: **GRVC** Housing Area: **2A**

## **Missed Visit Type**

Missed Visit type? Specialty: **On-Site**  
The following services were missed (Specialty): **Physical Therapy**

## **Missed Visit Comments**

Date of scheduled visit? **06/09/2021**  
What was the reason for missed visit? **Not Produced**

Signed By: **Dwyer, Nadia** at **6/11/2021 10:08:44 AM**

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# Correctional Health Services

**Patient Name:**  
ALEXANDER WILLIAMS  
**NYSID:**  
01897858L

**Latest Book and Case#:**  
1411801632  
**Patient Facility:**  
GRVC

## ALL - Missed Visit

Patient: ALEXANDER WILLIAMS DOB: 02/08/1981 Age: 40 Years Old  
Book & Case #: 1411801632 NYSID: 01897858L  
Facility: GRVC Housing Area: 2A

## Missed Visit Type

Missed Visit type? Nursing

The following services were missed (Nursing): Nursing Services Other

## Missed Visit Comments

Date of scheduled visit? 06/16/2021

What was the reason for missed visit? Not Produced

Missed visit comments: Pt was not produced by DOC.

Signed By: Sampeur, Marie at 6/16/2021 6:37:16 AM



# Correctional Health Services

**Patient Name:**  
ALEXANDER WILLIAMS  
**NYSID:**  
01897858L

**Latest Book and Case#:**  
1411801632  
**Patient Facility:**  
GRVC

**Form Name:** MH - PsychMeds Bridge  
**Form Obs:** MH - PsychMeds Bridge

## **MH - PsychMeds Bridge**

**Patient:** ALEXANDER WILLIAMS **DOB:** 02/08/1981 **Age:** 40 Years Old  
**Book & Case #:** 1411801632 **NYSID:** 01897858L  
**Facility:** GRVC **Housing Area:** 2A

## PsychMeds Bridge

**Missed Visit type?** PsychMeds

**The following services were missed:** Psych Medication Re-Evaluation

**Reason patient is being bridged:** Not Produced

**Date of last Psychiatry Medication Reevaluation::**

MH - Psychiatry - Medication Reevaluation (03/27/2021 6:46:55 PM)

**Number of previous consecutive bridges prior to this visit:** 3

### **Current Medications:**

MELATONIN 1 MG (MELATONIN) 1 mg hs Route: ORAL  
ARIPIPRAZOLE 5 MG (ABILIFY 5 MG) (ARIPIPRAZOLE) 5 mg hs; Route: ORAL  
ALBUTEROL 90 MCG / 1 INH (VENTOLIN / PROVENTIL HFA 90 MCG / (ALBUTEROL SULFATE) 2 puff  
q 6 hours prn; Route: INHALATION  
BECLOMETHASONE DIP HFA 80 MCG (QVAR REDHALER HFA 80 MCG) (BECLOMETHASONE  
DIPROP HFA) 1 puff bld.; Route: INHALATION

### **New Medications:**

MELATONIN 1 MG (MELATONIN) 1 mg hs Route: ORAL  
ARIPIPRAZOLE 5 MG (ABILIFY 5 MG) (ARIPIPRAZOLE) 5 mg hs; Route: ORAL

## **ALL - Missed Visit**

**Patient:** ALEXANDER WILLIAMS **DOB:** 02/08/1981 **Age:** 40 Years Old  
**Book & Case #:** 1411801632 **NYSID:** 01897858L  
**Facility:** GRVC **Housing Area:** 2A

## **Missed Visit Type**

**Missed Visit type?** PsychMeds

**The following services were missed (Psych Meds)** Psych Medication Re-Evaluation

## **Missed Visit Comments**

**What was the reason for missed visit?** Not Produced

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# Correctional Health Services

Patient Name:

ALEXANDER WILLIAMS

NYSID:

01897858L

Latest Book and Case#:

1411801632

Patient Facility:

GRVC



# Correctional Health Services

**Patient Name:**  
ALEXANDER WILLIAMS  
**NYSID:**  
01897858L

**Latest Book and Case#:**  
1411801632  
**Patient Facility:**  
GRVC

## ALL - Missed Visit

Patient: ALEXANDER WILLIAMS DOB: 02/08/1981 Age: 40 Years Old  
Book & Case #: 1411801632 NYSID: 01897858L  
Facility: GRVC Housing Area: 2A

## Missed Visit Type

Missed Visit type? Nursing

The following services were missed (Nursing): Nursing Follow-Up

## Missed Visit Comments

Date of scheduled visit? 06/23/2021

What was the reason for missed visit? Not Produced

Missed visit comments: Patient not produced by DOC for Lab. Capt. Fields aware

Signed By: Tabansi, Daniel at 6/23/2021 7:55:21 AM



# Correctional Health Services

**Patient Name:**

ALEXANDER WILLIAMS

**NYSID:**

01897858L

**Latest Book and Case#:**

1411801632

**Patient Facility:**

GRVC

**ALL - Missed Visit**

Patient: ALEXANDER WILLIAMS DOB: 02/08/1981 Age: 40 Years Old

Book & Case #: 1411801632 NYSID: 01897858L

Facility: GRVC Housing Area: 2A

**Missed Visit Type**

Missed Visit type? Nursing

The following services were missed (Nursing): Nursing Services Other

**Missed Visit Comments**

Date of scheduled visit? 06/23/2021

What was the reason for missed visit? Not Produced

Missed visit comments: Pt was not produced for blood work by C O Renoit. Capt Guam was notified.

Signed By: Sampeur, Marie at 6/23/2021 6:48:10 AM



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# Correctional Health Services

**Patient Name:**

ALEXANDER WILLIAMS

**NYSID:**

01897858L

**Latest Book and Case#:**

1411801632

**Patient Facility:**

GRVC

**ALL - Missed Visit**

Patient: ALEXANDER WILLIAMS DOB: 02/08/1981 Age: 40 Years Old

Book & Case #: 1411801632 NYSID: 01897858L

Facility: GRVC Housing Area: 2A

**Missed Visit Type**

Missed Visit type? Medical

The following services were missed (Medical): Chronic Care Visit

**Missed Visit Comments**

Date of scheduled visit? 07/01/2021

What was the reason for missed visit? Not Produced

Missed visit comments: AS PER CLINIC OFFICER , RUSSELL - NO ESCORT AVAILABLE TO PRODUCE THE PATIENT

Signed By: Kelly, Guy at 7/1/2021 8:27:42 PM



## Correctional Health Services

**Patient Name:**  
ALEXANDER WILLIAMS  
**NYSID:**  
01897858L

**Latest Book and Case#:**  
1411801632  
**Patient Facility:**  
GRVC

### **ALL - Missed Visit**

Patient: ALEXANDER WILLIAMS DOB: 02/08/1981 Age: 40 Years Old  
Book & Case #: 1411801632 NYSID: 01897858L  
Facility: GRVC Housing Area: 2A

### **Missed Visit Type**

**Missed Visit type?** PsychMeds

**The following services were missed (Psych Meds)** Psych Medication Re-Evaluation

### **Missed Visit Comments**

**Date of scheduled visit?** 07/01/2021

**What was the reason for missed visit?** Not Produced

Signed By: Otonichar, Joseph at 7/2/2021 3:20:30 PM



# Correctional Health Services

**Patient Name:**  
ALEXANDER WILLIAMS  
**NYSID:**  
01897858L

**Latest Book and Case#:**  
1411801632  
**Patient Facility:**  
GRVC

**Form Name:** MH - PsychMeds Bridge  
**Form Obs:** MH - PsychMeds Bridge

## MH - PsychMeds Bridge

**Patient:** ALEXANDER WILLIAMS **DOB:** 02/08/1981 **Age:** 40 Years Old  
**Book & Case #:** 1411801632 **NYSID:** 01897858L  
**Facility:** GRVC **Housing Area:** 2A

### PsychMeds Bridge

**Missed Visit type?** PsychMeds

**The following services were missed:** Psych Medication Re-Evaluation

**Reason patient is being bridged:** Not Produced

**Date of last Psychiatry Medication Reevaluation::**

MH - Psychiatry - Medication Reevaluation (03/27/2021 6:46:55 PM)

**Number of previous consecutive bridges prior to this visit:** 6

**Percent compliance with individual's medications since last prescription (Type medication name**

**and % compliance):** ARIPIPRAZOLE 5 MG TABLET HS TAKE 5mg AT BEDTIME 07/03/2021

07/10/2021 5/5 = 100% NON-CARRY Active ORAL 7/7/2021 8:01:00 PM 7/8/2021 9:00:00 PM

BECLOMETHASONE DIP HFA 80 MCG/INH BID ONE PUFF TWICE A DAY 05/20/2021 08/18/2021 2/2 =

100% CARRY Active INHALATION 6/23/2021 9:00:00 PM 7/24/2021 9:00:00 PM

MAALOX MAXIMUM STRENGTH ORAL SUSP BID TAKE 30cc (2 tablespoonsful) TWICE A DAY

07/03/2021 07/13/2021 1/1 = 100% CARRY Active ORAL 7/2/2021 9:51:00 AM 7/10/2021 9:00:00 PM

MELATONIN 1 MG (PSYCH) TABLET HS TAKE 1mg AT BEDTIME 07/03/2021 07/10/2021 5/5 = 100%

NON-CARRY Active ORAL 7/7/2021 8:01:00 PM 7/8/2021 9:00:00 PM

ARIPIPRAZOLE 5 MG TABLET HS 5 MG AT BEDTIME 06/25/2021 07/02/2021 8/8 = 100% NON-CARRY

Discontinued ORAL 7/2/2021 9:00:00 PM

MAALOX MAXIMUM STRENGTH ORAL SUSP BID 30 mL TWICE A DAY 06/23/2021 07/07/2021 2/3 =

67% CARRY Discontinued ORAL 6/30/2021 9:00:00 PM 7/7/2021 9:00:00 PM

MELATONIN 1 MG (PSYCH) TABLET HS ONE MG AT BEDTIME 06/25/2021 07/02/2021 8/8 = 100%

NON-CARRY Discontinued ORAL 7/2/2021 9:00:00 PM

**Relevant clinical information:** Pt not produced by DOC despite request. Pt housed in ESH. Will reschedule visit.

### **Current Medications:**

MAALOX MAXIMUM STRENGTH SUSP. 473 ML (MAALOX MAXIMUM STRENGTH (ALUM & MAG HYDROXIDE-SIMETH SUSP) 30cc by mouth twice a day

ARIPIPRAZOLE 5 MG (ABILIFY 5 MG) (ARIPIPRAZOLE) 5mg QHS; Route: ORAL

MELATONIN 1 MG (MELATONIN) 1mg QHS; Route: ORAL

ALBUTEROL 90 MCG / 1 INH (VENTOLIN / PROVENTIL HFA 90 MCG / (ALBUTEROL SULFATE) 2 puff q 6 hours prn; Route: INHALATION

BECLOMETHASONE DIP HFA 80 MCG (QVAR REDHALER HFA 80 MCG) (BECLOMETHASONE DIPROP HFA) 1 puff bid.; Route: INHALATION

### **New Medications:**

ARIPIPRAZOLE 5 MG (ABILIFY 5 MG) (ARIPIPRAZOLE) 5mg QHS; Route: ORAL

MELATONIN 1 MG (MELATONIN) 1mg QHS; Route: ORAL



# Correctional Health Services

**Patient Name:**

ALEXANDER WILLIAMS

**NYSID:**

01897858L

**Latest Book and Case#:**

1411801632

**Patient Facility:**

GRVC

**ALL - Missed Visit**

Patient: ALEXANDER WILLIAMS DOB: 02/08/1981 Age: 40 Years Old

Book & Case #: 1411801632 NYSID: 01897858L

Facility: GRVC Housing Area: 2A

**Missed Visit Type**

Missed Visit type? PsychMeds

The following services were missed (Psych Meds) Psych Medication Re-Evaluation

**Missed Visit Comments**

What was the reason for missed visit? Not Produced

Signed By: Otonichar, Joseph at 7/8/2021 2:33:53 PM

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## Correctional Health Services

**Patient Name:**  
ALEXANDER WILLIAMS  
**NYSID:**  
01897858L

**Latest Book and Case#:**  
1411801632  
**Patient Facility:**  
GRVC

**Form Name:** MH - PsychMeds Bridge  
**Form Obs:** MH - PsychMeds Bridge

### MH - PsychMeds Bridge

Patient: ALEXANDER WILLIAMS DOB: 02/08/1981 Age: 40 Years Old  
Book & Case #: 1411801632 NYSID: 01897858L  
Facility: GRVC Housing Area: 2A

### PsychMeds Bridge

**Missed Visit type?** PsychMeds

**The following services were missed:** Psych Medication Re-Evaluation

**Reason patient is being bridged:** Not Produced

**Date of last Psychiatry Medication Reevaluation::**

MH - Psychiatry - Medication Reevaluation (03/27/2021 6:46:55 PM)

**Number of previous consecutive bridges prior to this visit:** 7

**Percent compliance with individual's medications since last prescription (Type medication name and % compliance):** ARIPIRAZOLE 5 MG TABLET QHS 5MG AT BEDTIME 07/08/2021 07/15/2021 7/7 = 100% NON-CARRY Active ORAL 7/14/2021 9:00:00 PM 7/15/2021 9:00:00 PM

MELATONIN 1 MG (PSYCH) TABLET QHS 1MG AT BEDTIME 07/08/2021 07/15/2021 7/7 = 100% NON-CARRY Active ORAL 7/14/2021 9:00:00 PM 7/15/2021 9:00:00 PM

**Relevant clinical information:** Pt not produced despite request to DOC. Will again bridge MH Rx to limit interruption in care. Will reschedule f/u.

### **Current Medications:**

ACETAMINOPHEN 325 MG (TYLENOL 325 MG) (ACETAMINOPHEN) 2 TABS twice a day as needed; Route: ORAL

MAALOX MAXIMUM STRENGTH SUSP 473 ML (MAALOX MAXIMUM STRENGTH (ALUM & MAG HYDROXIDE-SIMETH SUSP) 30 ML DAILY PRN Route: ORAL

ARIPIRAZOLE 5 MG (ABILIFY 5 MG) (ARIPIRAZOLE) 5mg QHS; Route: ORAL

MELATONIN 1 MG (MELATONIN) 1mg QHS Route: ORAL

ALBUTEROL 90 MCG / 1 INH (VENTOLIN / PROVENTIL HFA 90 MCG / (ALBUTEROL SULFATE) 2 puff q 6 hours prn; Route: INHALATION

BECLOMETHASONE DIP HFA 80 MCG (QVAR REDHALER HFA 80 MCG) (BECLOMETHASONE DIPROP HFA) 1 puff bid; Route: INHALATION

### **New Medications:**

ARIPIRAZOLE 5 MG (ABILIFY 5 MG) (ARIPIRAZOLE) 5mg QHS; Route: ORAL

MELATONIN 1 MG (MELATONIN) 1mg QHS Route: ORAL

### **ALL - Missed Visit**

Patient: ALEXANDER WILLIAMS DOB: 02/08/1981 Age: 40 Years Old  
Book & Case #: 1411801632 NYSID: 01897858L  
Facility: GRVC Housing Area: 2A

### **Missed Visit Type**

**Missed Visit type?** PsychMeds

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# Correctional Health Services

**Patient Name:**

ALEXANDER WILLIAMS

**NYSID:**

01897858L

**Latest Book and Case#:**

1411801632

**Patient Facility:**

GRVC

The following services were missed (Psych Meds) Psych Medication Re-Evaluation

**Missed Visit Comments**

Date of scheduled visit? 07/15/2021

What was the reason for missed visit? Not Produced

Signed By: Otonichar, Joseph at 7/15/2021 2:31:43 PM



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## Correctional Health Services

**Patient Name:**

ALEXANDER WILLIAMS

**NYSID:**

01897858L

**Latest Book and Case#:**

1411801632

**Patient Facility:**

GRVC

**ALL - Missed Visit**

Patient: ALEXANDER WILLIAMS DOB: 02/08/1981 Age: 40 Years Old

Book & Case #: 1411801632 NYSID: 01897858L

Facility: GRVC Housing Area: 2A

**Missed Visit Type**

Missed Visit type? Nursing

The following services were missed (Nursing): VS/BP, Nursing Services Other

**Missed Visit Comments**

Date of scheduled visit? 07/21/2021

What was the reason for missed visit? Not Produced

Missed visit comments: Pt not prod. by DOC for Weight and VS/BP, Charge Nurse RN SON Napoleon notified for endorsement to next tour.

Signed By: Surajbali, Charlotte at 7/21/2021 12:46:04 PM



## Correctional Health Services

**Patient Name:**

ALEXANDER WILLIAMS

**NYSID:**

01897858L

**Latest Book and Case#:**

1411801632

**Patient Facility:**

GRVC

**ALL - Missed Visit**

Patient: ALEXANDER WILLIAMS DOB: 02/08/1981 Age: 40 Years Old

Book & Case #: 1411801632 NYSID: 01897858L

Facility: GRVC Housing Area: 2A

**Missed Visit Type**

Missed Visit type? Nursing

The following services were missed (Nursing): Nursing Follow-Up, Nursing Services Other

**Missed Visit Comments**

Date of scheduled visit? 07/22/2021

What was the reason for missed visit? Not Produced

Missed visit comments: Pt was not Produced by DOC, for nursing follow-up.

Signed By: Archer, Gwennette at 7/22/2021 1:29:55 PM



# Correctional Health Services

**Patient Name:**

ALEXANDER WILLIAMS

**NYSID:**

01897858L

**Latest Book and Case#:**

1411801632

**Patient Facility:**

GRVC

**ALL - Missed Visit**

Patient: ALEXANDER WILLIAMS DOB: 02/08/1981 Age: 40 Years Old

Book & Case #: 1411801632 NYSID: 01897858L

Facility: GRVC Housing Area: 2A

**Missed Visit Type**

Missed Visit type? Nursing

The following services were missed (Nursing): VS/BP, Nursing Services Other

**Missed Visit Comments**

Date of scheduled visit? 07/23/2021

What was the reason for missed visit? Not Produced

Missed visit comments: Pt not prod. by DOC for VS/BP and weight, charge Nurse RN Bredy notified for endorsement to next tour.

Signed By: Surajbali, Charlotte at 7/23/2021 12:39:28 PM

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## Correctional Health Services

**Patient Name:**

ALEXANDER WILLIAMS

**NYSID:**

01897858L

**Latest Book and Case#:**

1411801632

**Patient Facility:**

GRVC

**ALL - Missed Visit**

Patient: ALEXANDER WILLIAMS DOB: 02/08/1981 Age: 40 Years Old

Book & Case #: 1411801632 NYSID: 01897858L

Facility: GRVC Housing Area: 2A

**Missed Visit Type**

Missed Visit type? Specialty - On-Site

The following services were missed (Specialty): Podiatry

**Missed Visit Comments**

Date of scheduled visit? 07/23/2021

What was the reason for missed visit? Not Produced

Signed By: Dwyer, Nadia at 7/23/2021 3:32:08 PM

**NYC  
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HOSPITALS**

# Correctional Health Services

**Patient Name:**  
ALEXANDER WILLIAMS  
**NYSID:**  
01897858L

**Latest Book and Case#:**  
1411801632  
**Patient Facility:**  
GRVC

## **ALL - Missed Visit**

Patient: **ALEXANDER WILLIAMS** DOB: **02/08/1981** Age: **40 Years Old**  
Book & Case #: **1411801632** NYSID: **01897858L**  
Facility: **GRVC** Housing Area: **2A**

## **Missed Visit Type**

**Missed Visit type?** Nursing

**The following services were missed (Nursing):** VS/BP, Nursing Services Other.

## **Missed Visit Comments**

**Date of scheduled visit?** 07/25/2021

**What was the reason for missed visit?** Not Produced

**Missed visit comments:** Pt. not prod. by DOC for weight and VS/BP, Charge Nurse RN Martinez notified for endorsement to next tour.

Signed By: Surajbali, Charlotte at 7/25/2021 12:11:31 PM



# Correctional Health Services

**Patient Name:**

ALEXANDER WILLIAMS

**NYSID:**

01897858L

**Latest Book and Case#:**

1411801632

**Patient Facility:**

GRVC

**ALL - Missed Visit**

Patient: ALEXANDER WILLIAMS DOB: 02/08/1981 Age: 40 Years Old

Book & Case #: 1411801632 NYSID: 01897858L

Facility: GRVC Housing Area: 2A

**Missed Visit Type**

Missed Visit type? Nursing

The following services were missed (Nursing): VS/BP, Nursing Services Other

**Missed Visit Comments**

Date of scheduled visit? 07/25/2021

What was the reason for missed visit? Not Produced

Missed visit comments: Pt not produced by DOC for VS/BP and weight check.

Signed By: Martinez, Kati at 7/25/2021 6:40:00 PM



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## Correctional Health Services

**Patient Name:**

ALEXANDER WILLIAMS

**NYSID:**

01897858L

**Latest Book and Case#:**

1411801632

**Patient Facility:**

GRVC

**NU - Vital Signs**

Patient: ALEXANDER WILLIAMS DOB: 02/08/1981 Age: 40 Years Old

Book & Case #: 1411801632 NYSID: 01897858L

Facility: GRVC Housing Area: 2A

**Current Vital Signs**

Last height (inches): 73 (10/24/2019 7:57:04 PM) Last Weight: 221 (10/06/2020 11:24:56 AM)  
oF

**ALL - Missed Visit**

Patient: ALEXANDER WILLIAMS DOB: 02/08/1981 Age: 40 Years Old

Book & Case #: 1411801632 NYSID: 01897858L

Facility: GRVC Housing Area: 2A

**Missed Visit Type**

Missed Visit type? Nursing

**Missed Visit Comments**

Date of scheduled visit? 07/26/2021

What was the reason for missed visit? Not Produced

Missed visit comments: CO Munn given follow-up list, Captain Sapp made aware

Signed By: Mitchell, Justin at 7/26/2021 2:29:26 PM



# Correctional Health Services

**Patient Name:**

ALEXANDER WILLIAMS

**NYSID:**

01897858L

**Latest Book and Case#:**

1411801632

**Patient Facility:**

GRVC

**Date and Time Encounter Created:** July 27, 2021 11:57 AM

**ALL - Missed Visit**

Patient: ALEXANDER WILLIAMS DOB: 02/08/1981 Age: 40 Years Old

Book & Case #: 1411801632 NYSID: 01897858L

Facility: GRVC Housing Area: 2A

**Missed Visit Type**

Missed Visit type? Nursing

The following services were missed (Nursing): Nursing Follow-Up, VS/BP

**Missed Visit Comments**

Date of scheduled visit? 07/27/2021

What was the reason for missed visit? Not Produced

Missed visit comments: NSG POLICY89

CLINIC CAPTAIN NOTIFIED.

Signed By: Purrier, Sheldon at 7/27/2021 11:57:50 AM

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## Correctional Health Services

**Patient Name:**  
ALEXANDER WILLIAMS  
**NYSID:**  
01897858L

**Latest Book and Case#:**  
1411801632  
**Patient Facility:**  
GRVC

**Date and Time Encounter Created:** July 28, 2021 7:18 AM

### ALL - Missed Visit

Patient: ALEXANDER WILLIAMS DOB: 02/08/1981 Age: 40 Years Old  
Book & Case #: 1411801632 NYSID: 01897858L  
Facility: GRVC Housing Area: 2A

### Missed Visit Type

Missed Visit type? Nursing

The following services were missed (Nursing): Nursing Services Other

### Missed Visit Comments

Date of scheduled visit? 07/28/2021

What was the reason for missed visit? Not Produced

Missed visit comments: Pt was not produced for blood work by C O Renoit. Capt Loiseau made aware.

Signed By: Sampeur, Marie at 7/28/2021 7:19:01 AM



## Correctional Health Services

**Patient Name:**

ALEXANDER WILLIAMS

**NYSID:**

01897858L

**Latest Book and Case#:**

1411801632

**Patient Facility:**

GRVC

**Date and Time Encounter Created:** July 28, 2021 3:28 PM

**ALL - Missed Visit**

Patient: ALEXANDER WILLIAMS DOB: 02/08/1981 Age: 40 Years Old

Book & Case #: 1411801632 NYSID: 01897858L

Facility: GRVC Housing Area: 2A

**Missed Visit Type**

Missed Visit type? Nursing

The following services were missed (Nursing): Nursing Follow-Up, Nursing Services Other

**Missed Visit Comments**

Date of scheduled visit? 07/28/2021

What was the reason for missed visit? Not Produced

Missed visit comments: Pt not produced by DOC. for nursing follow-up.

Signed By: Archer, Gwennette at 7/28/2021 3:35:20 PM

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## Correctional Health Services

**Patient Name:**  
ALEXANDER WILLIAMS  
**NYSID:**  
01897858L

**Latest Book and Case#:**  
1411801632  
**Patient Facility:**  
GRVC

### ALL - Missed Visit

Patient: ALEXANDER WILLIAMS DOB: 02/08/1981 Age: 40 Years Old  
Book & Case #: 1411801632 NYSID: 01897858L  
Facility: GRVC Housing Area: 2A

### Missed Visit Type

Missed Visit type? Nursing

The following services were missed (Nursing): VS/BP

### Missed Visit Comments

Date of scheduled visit? 07/29/2021

What was the reason for missed visit? Not Produced

Date and Time Encounter Created: July 29, 2021 2:31 PM

Signed By: Jean, Edriste at 7/29/2021 2:32:04 PM



# Correctional Health Services

**Patient Name:**

ALEXANDER WILLIAMS

**NYSID:**

01897858L

**Latest Book and Case#:**

1411801632

**Patient Facility:**

GRVC

**ALL - Missed Visit**

Patient: ALEXANDER WILLIAMS DOB: 02/08/1981 Age: 40 Years Old

Book & Case #: 1411801632 NYSID: 01897858L

Facility: GRVC Housing Area: 2A

**Missed Visit Type**

Missed Visit type? Nursing

The following services were missed (Nursing): VS/BP

**Missed Visit Comments**

Date of scheduled visit? 07/30/2021

What was the reason for missed visit? Not Produced

Missed visit comments: F/U IN AM,

**Date and Time Encounter Created:** July 30, 2021 12:59 PM

Signed By: Jean, Edriste at 7/30/2021 1:01:13 PM



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# Correctional Health Services

**Patient Name:**

ALEXANDER WILLIAMS

**NYSID:**

01897858L

**Latest Book and Case#:**

1411801632

**Patient Facility:**

GRVC

**ALL - Missed Visit**

Patient: ALEXANDER WILLIAMS DOB: 02/08/1981 Age: 40 Years Old

Book & Case #: 1411801632 NYSID: 01897858L

Facility: GRVC Housing Area: 2A

**Missed Visit Type**

Missed Visit type? Nursing

The following services were missed (Nursing): VS/BP, Nursing Services Other

**Missed Visit Comments**

Date of scheduled visit? 07/31/2021

What was the reason for missed visit? Not Produced

Missed visit comments: Patient not produced by DOC

**Date and Time Encounter Created:** July 31, 2021 12:05 PM

Signed By: Olowoyo, Adetunke at 7/31/2021 1:15:43 PM

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## Correctional Health Services

**Patient Name:**

ALEXANDER WILLIAMS

**NYSID:**

01897858L

**Latest Book and Case#:**

1411801632

**Patient Facility:**

GRVC

**ALL - Missed Visit**

Patient: ALEXANDER WILLIAMS DOB: 02/08/1981 Age: 40 Years Old

Book & Case #: 1411801632 NYSID: 01897858L

Facility: GRVC Housing Area: 2A

**Missed Visit Type**

Missed Visit type? Nursing

The following services were missed (Nursing): VS/BP

**Missed Visit Comments**

Date of scheduled visit? 08/02/2021

What was the reason for missed visit? Not Produced

Missed visit comments: Charge Nurse and Captain made aware.

**Date and Time Encounter Created:** August 2, 2021 12:54 PM

Signed By: Quinones, Maritza at 8/2/2021 12:56:08 PM



# Correctional Health Services

**Patient Name:**

ALEXANDER WILLIAMS

**NYSID:**

01897858L

**Latest Book and Case#:**

1411801632

**Patient Facility:**

GRVC

**ALL - Missed Visit**

Patient: ALEXANDER WILLIAMS DOB: 02/08/1981 Age: 40 Years Old

Book & Case #: 1411801632 NYSID: 01897858L

Facility: GRVC Housing Area: 2A

**Missed Visit Type**

Missed Visit type? Nursing

The following services were missed (Nursing): VS/BP

**Missed Visit Comments**

Date of scheduled visit? 08/03/2021

What was the reason for missed visit? Not Produced

Missed visit comments: Charge Nurse and Captain made aware.

**Date and Time Encounter Created:** August 3, 2021 1:52 PM

Signed By: Quinones, Maritza at 8/3/2021 1:53:00 PM

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## Correctional Health Services

**Patient Name:**  
ALEXANDER WILLIAMS  
**NYSID:**  
01897858L

**Latest Book and Case#:**  
1411801632  
**Patient Facility:**  
GRVC

### ALL - Missed Visit

Patient: ALEXANDER WILLIAMS DOB: 02/08/1981 Age: 40 Years Old  
Book & Case #: 1411801632 NYSID: 01897858L  
Facility: GRVC Housing Area: 2A

### Missed Visit Type

Missed Visit type? PsychMeds

The following services were missed (Psych Meds) Psych Medication Re-Evaluation

### Missed Visit Comments

Date of scheduled visit? 08/03/2021

What was the reason for missed visit? Not Produced

**Date and Time Encounter Created:** August 5, 2021 2:08 PM

Signed By: Otonichar, Joseph at 8/5/2021 2:08:15 PM



# Correctional Health Services

**Patient Name:**  
ALEXANDER WILLIAMS  
**NYSID:**  
01897858L

**Latest Book and Case#:**  
1411801632  
**Patient Facility:**  
GRVC

**Form Name:** MH - PsychMeds Bridge  
**Form Obs:** MH - PsychMeds Bridge

## MH - PsychMeds Bridge

**Patient:** ALEXANDER WILLIAMS **DOB:** 02/08/1981 **Age:** 40 Years Old  
**Book & Case #:** 1411801632 **NYSID:** 01897858L  
**Facility:** GRVC **Housing Area:** 2A

### PsychMeds Bridge

**Missed Visit type?** PsychMeds

**The following services were missed:** Psych Medication Re-Evaluation

**Reason patient is being bridged:** Not Produced

**Date of of last Psychiatry Medication Reevaluation::**

MH - Psychiatry - Medication Reevaluation (07/20/2021 4:52:54 PM)

**Number of previous consecutive bridges prior to this visit:** 0

**Percent compliance with individual's medications since last prescription (Type medication name and % compliance):** DIPHENHYDRAMINE (PSYCH) 50 MG CAPSULE QHS 50MG AT BEDTIME

07/20/2021 08/03/2021 14/15 = 93% NON-CARRY Discontinued ORAL 8/3/2021 9:00:00 PM

MELATONIN 1 MG (PSYCH) TABLET QHS 1MG AT BEDTIME 07/20/2021 08/03/2021 14/15 = 93%  
NON-CARRY Discontinued ORAL 8/3/2021 9:00:00 PM

### **Current Medications:**

PSEUDOEPHEDRINE HCL 30 MG (SUDAFED 30 MG) (PSEUDOEPHEDRINE HCL) take one tablet every 12 hours; Route: ORAL

CALCIUM POLYCARBOPHIL 625 MG ORAL TABLET (CALCIUM POLYCARBOPHIL) two tabs by mouth twice a day; Route: ORAL

ALBUTEROL 90 MCG / 1 INH (VENTOLIN / PROVENTIL HFA 90 MCG / (ALBUTEROL SULFATE) 2 puff q 6 hours prn; Route: INHALATION

BECLOMETHASONE DIP HFA 80 MCG (QVAR REDHALER HFA 80 MCG) (BECLOMETHASONE DIPROP HFA) 1 puff bid.; Route: INHALATION

### **New Medications:**

DIPHENHYDRAMINE (PSYCH) 50 MG (BENADRYL (PSYCH) 50 MG) (DIPHENHYDRAMINE HCL) 50mg QHS; Route: ORAL

MELATONIN 1 MG (MELATONIN) 1mg QHS Route: ORAL

## **ALL - Missed Visit**

**Patient:** ALEXANDER WILLIAMS **DOB:** 02/08/1981 **Age:** 40 Years Old  
**Book & Case #:** 1411801632 **NYSID:** 01897858L  
**Facility:** GRVC **Housing Area:** 2A

### **Missed Visit Type**

**Missed Visit type?** PsychMeds

**The following services were missed (Psych Meds)** Psych Medication Re-Evaluation

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# Correctional Health Services

**Patient Name:**

ALEXANDER WILLIAMS

**NYSID:**

01897858L

**Latest Book and Case#:**

1411801632

**Patient Facility:**

GRVC

**Missed Visit Comments**

What was the reason for missed visit? Not Produced

**Date and Time Encounter Created:** August 5, 2021 2:08 PM

Signed By: Otonichar, Joseph at 8/5/2021 2:10:00 PM





# Correctional Health Services

**Patient Name:**  
ALEXANDER WILLIAMS  
**NYSID:**  
01897858L

**Latest Book and Case#:**  
1411801632  
**Patient Facility:**  
GRVC

## **ALL - Missed Visit**

Patient: ALEXANDER WILLIAMS DOB: 02/08/1981 Age: 40 Years Old  
Book & Case #: 1411801632 NYSID: 01897858L  
Facility: GRVC Housing Area: 2A

## **Missed Visit Type**

Missed Visit type? Nursing

The following services were missed (Nursing): Nursing Follow-Up

## **Missed Visit Comments**

Date of scheduled visit? 08/12/2021

What was the reason for missed visit? Not Produced

Missed visit comments: Patient not produced by DOC

**Date and Time Encounter Created:** August 12, 2021 3:25 PM

Signed By: Mcdonald, Remona at 8/12/2021 3:26:07 PM



# Correctional Health Services

**Patient Name:**

ALEXANDER WILLIAMS

**NYSID:**

01897858L

**Latest Book and Case#:**

1411801632

**Patient Facility:**

GRVC

**ALL - Missed Visit**

Patient: ALEXANDER WILLIAMS DOB: 02/08/1981 Age: 40 Years Old

Book & Case #: 1411801632 NYSID: 01897858L

Facility: GRVC Housing Area: 2A

**Missed Visit Type**

Missed Visit type? Nursing

The following services were missed (Nursing): VS/BP, Nursing Services Other

**Missed Visit Comments**

Date of scheduled visit? 08/09/2021

What was the reason for missed visit? Not Produced

Missed visit comments: Pt. not prod. by DOC for weight VS/BP, charge Nurse RN Mitchell notified for endorsement to next tour.

**Date and Time Encounter Created:** August 9, 2021 1:00 PM

Signed By: Surajbali, Charlotte at 8/9/2021 1:00:45 PM

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# Correctional Health Services

**Patient Name:**  
ALEXANDER WILLIAMS  
**NYSID:**  
01897858L

**Latest Book and Case#:**  
1411801632  
**Patient Facility:**  
GRVC

## **ALL - Missed Visit**

Patient: ALEXANDER WILLIAMS DOB: 02/08/1981 Age: 40 Years Old  
Book & Case #: 1411801632 NYSID: 01897858L  
Facility: GRVC Housing Area: 2A

## **Missed Visit Type**

Missed Visit type? Nursing  
The following services were missed (Nursing): VS/BP

## **Missed Visit Comments**

Date of scheduled visit? 08/10/2021  
What was the reason for missed visit? Not Produced  
Missed visit comments: NSG POLICY89  
CLINIC CAPTAIN FIELDS NOTIFIED.

**Date and Time Encounter Created:** August 10, 2021 1:29 PM

Signed By: Purrier, Sheldon at 8/10/2021 1:30:23 PM



# Correctional Health Services

**Patient Name:**

ALEXANDER WILLIAMS

**NYSID:**

01897858L

**Latest Book and Case#:**

1411801632

**Patient Facility:**

GRVC

**ALL - Missed Visit**

Patient: ALEXANDER WILLIAMS DOB: 02/08/1981 Age: 40 Years Old

Book & Case #: 1411801632 NYSID: 01897858L

Facility: GRVC Housing Area: 2A

**Missed Visit Type**

Missed Visit type? Specialty - On-Site

The following services were missed (Specialty): Podiatry

**Missed Visit Comments**

Date of scheduled visit? 08/10/2021

What was the reason for missed visit? Not Produced

Missed visit comments: Patient was not seen in (not produced to) West Facility Podiatry clinic on 8/10/21.

**Date and Time Encounter Created:** August 10, 2021 3:00 PM

Signed By: Goldberg, Allan at 8/10/2021 3:00:48 PM



# Correctional Health Services

**Patient Name:**  
ALEXANDER WILLIAMS  
**NYSID:**  
01897858L

**Latest Book and Case#:**  
1411801632  
**Patient Facility:**  
GRVC

## ALL - Missed Visit

Patient: ALEXANDER WILLIAMS DOB: 02/08/1981 Age: 40 Years Old  
Book & Case #: 1411801632 NYSID: 01897858L  
Facility: GRVC Housing Area: 2A

## Missed Visit Type

Missed Visit type? Nursing

The following services were missed (Nursing): Nursing Services Other

## Missed Visit Comments

Date of scheduled visit? 08/11/2021

What was the reason for missed visit? Not Produced

Missed visit comments: Patient not produced by DOC.

**Date and Time Encounter Created:** August 11, 2021 3:26 PM

Signed By: Okon, Linnette at 8/11/2021 3:27:05 PM



# Correctional Health Services

**Patient Name:**  
ALEXANDER WILLIAMS  
**NYSID:**  
01897858L

**Latest Book and Case#:**  
1411801632  
**Patient Facility:**  
GRVC

## **ALL - Missed Visit**

Patient: **ALEXANDER WILLIAMS** DOB: **02/08/1981** Age: **40 Years Old**  
Book & Case #: **1411801632** NYSID: **01897858L**  
Facility: **GRVC** Housing Area: **2A**

## **Missed Visit Type**

**Missed Visit type?** Nursing

**The following services were missed (Nursing):** VS/BP

## **Missed Visit Comments**

**Date of scheduled visit?** 08/11/2021

**What was the reason for missed visit?** Not Produced

**Date and Time Encounter Created:** August 11, 2021 3:37 PM

Signed By: Williams, Andre at 8/11/2021 3:37:26 PM



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## Correctional Health Services

**Patient Name:**

ALEXANDER WILLIAMS

**NYSID:**

01897858L

**Latest Book and Case#:**

1411801632

**Patient Facility:**

GRVC

**ALL - Missed Visit**

Patient: ALEXANDER WILLIAMS DOB: 02/08/1981 Age: 40 Years Old

Book & Case #: 1411801632 NYSID: 01897858L

Facility: GRVC Housing Area: 2A

**Missed Visit Type**

Missed Visit type? Nursing

The following services were missed (Nursing): Nursing Follow-Up

**Missed Visit Comments**

Date of scheduled visit? 08/12/2021

What was the reason for missed visit? Not Produced

Missed visit comments: wt and vs

**Date and Time Encounter Created:** August 12, 2021 4:13 PM

Signed By: Razak, Juanita at 8/12/2021 4:13:44 PM

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# Correctional Health Services

**Patient Name:**  
ALEXANDER WILLIAMS  
**NYSID:**  
01897858L

**Latest Book and Case#:**  
1411801632  
**Patient Facility:**  
GRVC

## **NU - Vital Signs**

Patient: ALEXANDER WILLIAMS DOB: 02/08/1981 Age: 40 Years Old  
Book & Case #: 1411801632 NYSID: 01897858L  
Facility: GRVC Housing Area: 2A

## **Current Vital Signs**

Last height (inches): 73 (10/24/2019 7:57:04 PM) Last Weight: 221 (10/06/2020 11:24:56 AM)  
oF

## **ALL - Missed Visit**

Patient: ALEXANDER WILLIAMS DOB: 02/08/1981 Age: 40 Years Old  
Book & Case #: 1411801632 NYSID: 01897858L  
Facility: GRVC Housing Area: 2A

## **Missed Visit Type**

Missed Visit type? Nursing

The following services were missed (Nursing): Nursing Follow-Up

## **Missed Visit Comments**

Date of scheduled visit? 08/13/2021

What was the reason for missed visit? Not Produced

Missed visit comments: Follow up list given to DOC, Patient was not produced. CO Robert

**Date and Time Encounter Created:** August 13, 2021 10:04 AM

Signed By: Mitchell, Justin at 8/13/2021 12:54:34 PM



# Correctional Health Services

**Patient Name:**

ALEXANDER WILLIAMS

**NYSID:**

01897858L

**Latest Book and Case#:**

1411801632

**Patient Facility:**

GRVC

**Form Name:** MH - PsychMeds Bridge

**Form Obs:** MH - PsychMeds Bridge

**MH - PsychMeds Bridge**

Patient: ALEXANDER WILLIAMS DOB: 02/08/1981 Age: 40 Years Old

Book & Case #: 1411801632 NYSID: 01897858L

Facility: GRVC Housing Area: 2A

PsychMeds Bridge

**Missed Visit type?** PsychMeds

**The following services were missed:** Psych Medication Re-Evaluation

**Reason patient is being bridged:** Not Produced

**Date of of last Psychiatry Medication Reevaluation::**

MH - Psychiatry - Medication Reevaluation (07/20/2021 4:52:54 PM)

**Percent compliance with individual's medications since last prescription (Type medication name and % compliance):** smi-no

benadryl

melatonin

unable to check compliance - program not working

**Relevant clinical information:** per doc staff higgins was not produced

**Current Medications:**

IBUPROFEN 400 MG (MOTRIN 400 MG) (IBUPROFEN) 400 mg by mouth twice a day with food;

Route: ORAL

DIPHENHYDRAMINE (PSYCH) 50 MG (BENADRYL (PSYCH) 50 MG) (DIPHENHYDRAMINE HCL)

50mg QHS; Route: ORAL

MELATONIN 1 MG (MELATONIN) 1mg QHS; Route: ORAL

CALCIUM POLYCARBOPHIL 625 MG ORAL TABLET (CALCIUM POLYCARBOPHIL) two tabs by mouth twice a day; Route: ORAL

ALBUTEROL 90 MCG / 1 INH (VENTOLIN / PROVENTIL HFA 90 MCG / (ALBUTEROL SULFATE) 2 puff q 6 hours prn; Route: INHALATION

BECLOMETHASONE DIP HFA 80 MCG (QVAR REDHALER HFA 80 MCG) (BECLOMETHASONE

DIPROP HFA) 1 puff bid; Route: INHALATION

**New Medications:**

MELATONIN 1 MG (MELATONIN) take 1 mg by mouth at bedtime; Route: ORAL

DIPHENHYDRAMINE (PSYCH) 50 MG (BENADRYL (PSYCH) 50 MG) (DIPHENHYDRAMINE HCL) take 50 mg by mouth at bedtime; Route: ORAL

**ALL - Missed Visit**

Patient: ALEXANDER WILLIAMS DOB: 02/08/1981 Age: 40 Years Old

Book & Case #: 1411801632 NYSID: 01897858L

Facility: GRVC Housing Area: 2A

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# Correctional Health Services

**Patient Name:**

ALEXANDER WILLIAMS

**NYSID:**

01897858L

**Latest Book and Case#:**

1411801632

**Patient Facility:**

GRVC

**Missed Visit type?** PsychMeds

**The following services were missed (Psych Meds)** Psych Medication Re-Evaluation

**Missed Visit Comments**

**What was the reason for missed visit?** Not Produced

**Date and Time Encounter Created:** August 14, 2021 10:40 PM

**Signed By:** Calicdan, Raul at 8/14/2021 10:46:06 PM



# Correctional Health Services

**Patient Name:**  
ALEXANDER WILLIAMS  
**NYSID:**  
01897858L

**Latest Book and Case#:**  
1411801632  
**Patient Facility:**  
GRVC

## ALL - Missed Visit

Patient: ALEXANDER WILLIAMS DOB: 02/08/1981 Age: 40 Years Old  
Book & Case #: 1411801632 NYSID: 01897858L  
Facility: GRVC Housing Area: 2A

## Missed Visit Type

Missed Visit type? Nursing

The following services were missed (Nursing): VS/BP

## Missed Visit Comments

Date of scheduled visit? 08/16/2021

What was the reason for missed visit? Not Produced

**Date and Time Encounter Created:** August 16, 2021 2:40 PM

Signed By: Blount, Jacqueline at 8/16/2021 2:41:16 PM



## Correctional Health Services

**Patient Name:**

ALEXANDER WILLIAMS

**NYSID:**

01897858L

**Latest Book and Case#:**

1411801632

**Patient Facility:**

GRVC

**ALL - Missed Visit**

Patient: ALEXANDER WILLIAMS DOB: 02/08/1981 Age: 40 Years Old

Book & Case #: 1411801632 NYSID: 01897858L

Facility: GRVC Housing Area: 2A

**Missed Visit Type**

Missed Visit type? Nursing

The following services were missed (Nursing): Nursing Services Other

**Missed Visit Comments**

Date of scheduled visit? 08/18/2021

What was the reason for missed visit? Not Produced

Missed visit comments: Pt was not produced for blood work by C O Renoit. Capt Johnson made aware

**Date and Time Encounter Created:** August 18, 2021 7:23 AM

Signed By: Sampeur, Marie at 8/18/2021 7:23:59 AM



# Correctional Health Services

**Patient Name:**

ALEXANDER WILLIAMS

**NYSID:**

01897858L

**Latest Book and Case#:**

1411801632

**Patient Facility:**

GRVC

**ALL - Missed Visit**

Patient: ALEXANDER WILLIAMS DOB: 02/08/1981 Age: 40 Years Old

Book & Case #: 1411801632 NYSID: 01897858L

Facility: GRVC Housing Area: 2A

**Missed Visit Type**

Missed Visit type? Nursing

The following services were missed (Nursing): Nursing Follow-Up, VS/BP

**Missed Visit Comments**

Date of scheduled visit? 08/19/2021

What was the reason for missed visit? Not Produced

Missed visit comments: Pt not produced by DOC.

**Date and Time Encounter Created:** August 19, 2021 3:22 PM

Signed By: Okon, Linnette at 8/19/2021 3:23:02 PM





# Correctional Health Services

**Patient Name:**  
ALEXANDER WILLIAMS  
**NYSID:**  
01897858L

**Latest Book and Case#:**  
1411801632  
**Patient Facility:**  
GRVC

## **ALL - Missed Visit**

Patient: **ALEXANDER WILLIAMS** DOB: **02/08/1981** Age: **40 Years Old**  
Book & Case #: **1411801632** NYSID: **01897858L**  
Facility: **GRVC** Housing Area: **2A**

## **Missed Visit Type**

**Missed Visit type?** Nursing

**The following services were missed (Nursing):** Nursing Follow-Up, VS/BP

## **Missed Visit Comments**

**Date of scheduled visit?** 08/20/2021

**What was the reason for missed visit?** Not Produced

**Missed visit comments:** Pt not produced by DOC.

**Date and Time Encounter Created:** August 20, 2021 3:14 PM

**Signed By:** Okon, Linnette at 8/20/2021 3:14:57 PM

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## Correctional Health Services

**Patient Name:**  
ALEXANDER WILLIAMS  
**NYSID:**  
01897858L

**Latest Book and Case#:**  
1411801632  
**Patient Facility:**  
GRVC

### ALL - Missed Visit

Patient: ALEXANDER WILLIAMS DOB: 02/08/1981 Age: 40 Years Old  
Book & Case #: 1411801632 NYSID: 01897858L  
Facility: GRVC Housing Area: 2A

### Missed Visit Type

Missed Visit type? Nursing

The following services were missed (Nursing): VS/BP

### Missed Visit Comments

Date of scheduled visit? 08/21/2021

What was the reason for missed visit? Not Produced

Missed visit comments: not produced by DOC for VS/BP

**Date and Time Encounter Created:** August 21, 2021 3:45 PM

Signed By: Adrien, Elza at 8/21/2021 3:45:28 PM

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# Correctional Health Services

**Patient Name:**

ALEXANDER WILLIAMS

**NYSID:**

01897858L

**Latest Book and Case#:**

1411801632

**Patient Facility:**

GRVC

**ALL - Missed Visit**

Patient: ALEXANDER WILLIAMS DOB: 02/08/1981 Age: 40 Years Old

Book & Case #: 1411801632 NYSID: 01897858L

Facility: GRVC Housing Area: 2A

**Missed Visit Type**

Missed Visit type? Nursing

The following services were missed (Nursing): Nursing Services Other

**Missed Visit Comments**

Date of scheduled visit? 08/25/2021

What was the reason for missed visit? Not Produced

Missed visit comments: pt not produced by DOC.

**Date and Time Encounter Created:** August 25, 2021 3:00 PM

Signed By: Okon, Linnette at 8/25/2021 3:00:34 PM



## Correctional Health Services

**Patient Name:**  
ALEXANDER WILLIAMS  
**NYSID:**  
01897858L

**Latest Book and Case#:**  
1411801632  
**Patient Facility:**  
GRVC

### ALL - Missed Visit

Patient: ALEXANDER WILLIAMS DOB: 02/08/1981 Age: 40 Years Old  
Book & Case #: 1411801632 NYSID: 01897858L  
Facility: GRVC Housing Area: 2A

### Missed Visit Type

Missed Visit type? Nursing

The following services were missed (Nursing): Nursing Follow-Up, Nursing Services Other

### Missed Visit Comments

Date of scheduled visit? 09/01/2021

What was the reason for missed visit? Not Produced

Missed visit comments: pt not produced by DOC.

**Date and Time Encounter Created:** September 1, 2021 3:23 PM

Signed By: Okon, Linnette at 9/1/2021 3:23:56 PM



# Correctional Health Services

**Patient Name:**

ALEXANDER WILLIAMS

**NYSID:**

01897858L

**Latest Book and Case#:**

1411801632

**Patient Facility:**

GRVC

**ALL - Missed Visit**

Patient: ALEXANDER WILLIAMS DOB: 02/08/1981 Age: 40 Years Old

Book & Case #: 1411801632 NYSID: 01897858L

Facility: GRVC Housing Area: 2A

**Missed Visit Type**

Missed Visit type? Nursing

The following services were missed (Nursing): Nursing Follow-Up, COVID-19 PCR Testing

**Missed Visit Comments**

Date of scheduled visit? 09/22/2021

What was the reason for missed visit? Not Produced

Missed visit comments: Pt not produced by DOC, for nursing follow-up.

**Date and Time Encounter Created:** September 22, 2021 3:25 PM

Signed By: Archer, Gwennette at 9/22/2021 3:25:28 PM



# Correctional Health Services

**Patient Name:**  
ALEXANDER WILLIAMS  
**NYSID:**  
01897858L

**Latest Book and Case#:**  
1411801632  
**Patient Facility:**  
GRVC

**Form Name:** MH - PsychMeds Bridge  
**Form Obs:** MH - PsychMeds Bridge

## MH - PsychMeds Bridge

**Patient:** ALEXANDER WILLIAMS **DOB:** 02/08/1981 **Age:** 40 Years Old  
**Book & Case #:** 1411801632 **NYSID:** 01897858L  
**Facility:** GRVC **Housing Area:** 2A

## PsychMeds Bridge

**Missed Visit type?** PsychMeds

**The following services were missed:** Psych Medication Re-Evaluation

**Reason patient is being bridged:** Not Produced

**Date of of last Psychiatry Medication Reevaluation::**

MH - Psychiatry - Medication Reevaluation (09/04/2021 3:20:50 PM)

**Percent compliance with individual's medications since last prescription (Type medication name and % compliance):** smi - no

melatonin- 96%

benadryl - 96 %

## Current Medications:

MELATONIN 1 MG (MELATONIN) take 1 mg by mouth at bedtime Route: ORAL  
DIPHENHYDRAMINE (PSYCH) 50 MG (BENADRYL (PSYCH) 50 MG) (DIPHENHYDRAMINE HCL) take 50 mg by mouth at bedtime; Route: ORAL  
ALBUTEROL 90 MCG / 1 INH (VENTOLIN / PROVENTIL HFA 90 MCG / (ALBUTEROL SULFATE) 2 puff q 6 hours prn; Route: INHALATION  
BECLOMETHASONE DIP HFA 80 MCG (QVAR REDHALER HFA 80 MCG) (BECLOMETHASONE DIPROP HFA) 1 puff bid.; Route: INHALATION

## New Medications:

DIPHENHYDRAMINE (PSYCH) 50 MG (BENADRYL (PSYCH) 50 MG) (DIPHENHYDRAMINE HCL) take 50 mg by mouth at bedtime; Route: ORAL  
MELATONIN 1 MG (MELATONIN) take 1 mg by mouth at bedtime Route: ORAL

## ALL - Missed Visit

**Patient:** ALEXANDER WILLIAMS **DOB:** 02/08/1981 **Age:** 40 Years Old  
**Book & Case #:** 1411801632 **NYSID:** 01897858L  
**Facility:** GRVC **Housing Area:** 2A

## Missed Visit Type

**Visit type?** PsychMeds

**ing services were missed (Psych Meds)** Psych Medication Re-Evaluation

omments

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# Correctional Health Services

**Patient Name:**  
ALEXANDER WILLIAMS  
**NYSID:**  
01897858L

**Latest Book and Case#:**  
1411801632  
**Patient Facility:**  
GRVC

What was the reason for missed visit? Not Produced

**Date and Time Encounter Created:** October 2, 2021 10:57 AM

Signed By: Calicdan, Raul at 10/2/2021 11:01:51 AM



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## Correctional Health Services

**Patient Name:**

ALEXANDER WILLIAMS

**NYSID:**

01897858L

**Latest Book and Case#:**

1411801632

**Patient Facility:**

GRVC

**ALL - Missed Visit**

Patient: ALEXANDER WILLIAMS DOB: 02/08/1981 Age: 40 Years Old

Book & Case #: 1411801632 NYSID: 01897858L

Facility: GRVC Housing Area: 2A

**Missed Visit Type**

Missed Visit type? Specialty - On-Site

The following services were missed (Specialty): Podiatry

**Missed Visit Comments**

Date of scheduled visit? 10/04/2021

What was the reason for missed visit? Not Produced

Missed visit comments: Patient was not seen in (not produced to) West Facility Podiatry clinic on 10/4/21.

**Date and Time Encounter Created:** October 4, 2021 3:26 PM

Signed By: Goldberg, Allan at 10/4/2021 3:26:49 PM



# Correctional Health Services

**Patient Name:**

ALEXANDER WILLIAMS

**NYSID:**

01897858L

**Latest Book and Case#:**

1411801632

**Patient Facility:**

GRVC

**ALL - Missed Visit**

Patient: **ALEXANDER WILLIAMS** DOB: **02/08/1981** Age: **40 Years Old**

Book & Case #: **1411801632** NYSID: **01897858L**

Facility: **GRVC** Housing Area: **2A**

**Missed Visit Type**

Missed Visit type? **Nursing**

The following services were missed (Nursing): **Nursing Services Other**

**Missed Visit Comments**

Date of scheduled visit? **10/06/2021**

What was the reason for missed visit? **Not Produced**

Missed visit comments: **Pt was not produced by CO Mcquiller. Capt Guam was notified.**

**Date and Time Encounter Created:** October 6, 2021 7:09 AM

Signed By: **Sampeur, Marie** at 10/6/2021 7:10:03 AM



# Correctional Health Services

**Patient Name:**  
ALEXANDER WILLIAMS  
**NYSID:**  
01897858L

**Latest Book and Case#:**  
1411801632  
**Patient Facility:**  
GRVC

## ALL - Missed Visit

Patient: **ALEXANDER WILLIAMS** DOB: **02/08/1981** Age: **40 Years Old**  
Book & Case #: **1411801632** NYSID: **01897858L**  
Facility: **GRVC** Housing Area: **2A**

## Missed Visit Type

Missed Visit type? **Nursing**

The following services were missed (Nursing): **Nursing Services Other**

## Missed Visit Comments

Date of scheduled visit? **11/03/2021**

What was the reason for missed visit? **Not Produced**

Missed visit comments: **LAB**

**NSG POLICY89**

**BING CAPTAIN AND CLINIC CAPTAIN NOTIFIED.**

**Date and Time Encounter Created:** November 3, 2021 12:50 PM

Signed By: Purrier, Sheldon at 11/3/2021 12:51:04 PM

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## Correctional Health Services

**Patient Name:**  
ALEXANDER WILLIAMS  
**NYSID:**  
01897858L

**Latest Book and Case#:**  
1411801632  
**Patient Facility:**  
GRVC

### ALL - Missed Visit

Patient: ALEXANDER WILLIAMS DOB: 02/08/1981 Age: 40 Years Old  
Book & Case #: 1411801632 NYSID: 01897858L  
Facility: GRVC Housing Area: 2A

### Missed Visit Type

Missed Visit type? Specialty - On-Site

The following services were missed (Specialty): Podiatry

### Missed Visit Comments

Date of scheduled visit? 11/08/2021

What was the reason for missed visit? Not Produced

Missed visit comments: Patient was not seen in (not produced to) Podiatry clinic on 11/8/21.

**Date and Time Encounter Created:** November 8, 2021 2:48 PM

Signed By: Goldberg, Allan at 11/8/2021 2:48:33 PM



# Correctional Health Services

**Patient Name:**  
ALEXANDER WILLIAMS  
**NYSID:**  
01897858L

**Latest Book and Case#:**  
1411801632  
**Patient Facility:**  
GRVC

## **ALL - Missed Visit**

Patient: **ALEXANDER WILLIAMS** DOB: **02/08/1981** Age: **40 Years Old**  
Book & Case #: **1411801632** NYSID: **01897858L**  
Facility: **GRVC** Housing Area: **2A**

## **Missed Visit Type**

Missed Visit type? **MH Visit**

The following services were missed (**MH Visit**): TPR and Clinician Progress Note

## **Missed Visit Comments**

Date of scheduled visit? **12/16/2021**

What was the reason for missed visit? **Not Produced**

Missed visit comments: **DOC Alarm at clinic. Pt was rescheduled.**

**Date and Time Encounter Created:** December 16, 2021 11:25 PM

Signed By: **Whittingham, Phillip** at 12/16/2021 11:26:40 PM

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# Correctional Health Services

**Patient Name:**  
ALEXANDER WILLIAMS  
**NYSID:**  
01897858L

**Latest Book and Case#:**  
1411801632  
**Patient Facility:**  
GRVC

**Form Name:** MH - PsychMeds Bridge  
**Form Obs:** MH - PsychMeds Bridge

## **MH - PsychMeds Bridge**

**Patient:** ALEXANDER WILLIAMS **DOB:** 02/08/1981 **Age:** 40 Years Old  
**Book & Case #:** 1411801632 / **NYSID:** 01897858L  
**Facility:** GRVC **Housing Area:** 2A

### PsychMeds Bridge

**Missed Visit type?** PsychMeds

**The following services were missed:** Psych Medication Re-Evaluation

**Reason patient is being bridged:** Not Produced

**Date of of last Psychiatry Medication Reevaluation::**

MH - Psychiatry - Medication Reevaluation (12/06/2021 3:38:39 PM)

**Number of previous consecutive bridges prior to this visit:** 2

**Percent compliance with individual's medications since last prescription (Type medication name and % compliance):** DIPHENHYDRAMINE (PSYCH) 50 MG CAPSULE QHS

50MG AT BEDTIME

12/06/2021

01/05/2022

30/30 = 100%

NON-CARRY

Active

ORAL

1/4/2022 6:41:00 PM

1/5/2022 9:00:00 PM

HEMORRHOIDAL 0.25% 1 SUPP.RECT BID

INSERT ONE SUPPOSITORY RECTALLY TWICE A DAY AS DIRECTED

12/27/2021

01/11/2022

28/28 = 100%

CARRY

Active

RECTAL

1/3/2022 9:00:00 PM

1/10/2022 9:00:00 PM

MELATONIN 1 MG (PSYCH) TABLET QHS

2MG AT BEDTIME

12/06/2021

01/05/2022

30/30 = 100%

NON-CARRY

Active

ORAL

1/4/2022 6:41:00 PM

1/5/2022 9:00:00 P

**Current Medications:**

HEMORRHOIDAL 0.25% SUPP 1 SUP (ANUMED 1 SUP) (PHENYLEPHRINE-COCOA BUTTER SUPP)



## Correctional Health Services

**Patient Name:**

ALEXANDER WILLIAMS

**NYSID:**

01897858L

**Latest Book and Case#:**

1411801632

**Patient Facility:**

GRVC

One supp. Rectally twice a day; Route: RECTAL

DIPHENHYDRAMINE (PSYCH) 50 MG (BENADRYL (PSYCH) 50 MG) (DIPHENHYDRAMINE HCL) 50mg QHS; Route: ORAL

MELATONIN 1 MG (MELATONIN) 2mg QHS; Route: ORAL

ALBUTEROL 90 MCG / 1 INH (VENTOLIN / PROVENTIL HFA 90 MCG / (ALBUTEROL SULFATE) 2 puff q 6 hours prn; Route: INHALATION

BECLOMETHASONE DIP HFA 80 MCG (QVAR REDHALER HFA 80 MCG) (BECLOMETHASONE DIPROP HFA) 1 puff bid.; Route: INHALATION

**New Medications:**

DIPHENHYDRAMINE (PSYCH) 50 MG (BENADRYL (PSYCH) 50 MG) (DIPHENHYDRAMINE HCL) 50mg QHS; Route: ORAL

MELATONIN 1 MG (MELATONIN) 2mg QHS; Route: ORAL

**ALL - Missed Visit**

Patient: ALEXANDER WILLIAMS DOB: 02/08/1981 Age: 40 Years Old

Book & Case #: 1411801632 NYSID: 01897858L

Facility: GRVC Housing Area: 2A

**Missed Visit Type**

Missed Visit type? PsychMeds

The following services were missed (Psych Meds) Psych Medication Re-Evaluation

**Missed Visit Comments**

What was the reason for missed visit? Not Produced

**Date and Time Encounter Created:** January 5, 2022 3:50 PM

Signed By: Otonichar, Joseph at 1/5/2022 3:51:21 PM





# Correctional Health Services

**Patient Name:**

ALEXANDER WILLIAMS

**NYSID:**

01897858L

**Latest Book and Case#:**

1411801632

**Patient Facility:**

GRVC

**ALL - Missed Visit**

Patient: ALEXANDER WILLIAMS DOB: 02/08/1981 Age: 40 Years Old

Book & Case #: 1411801632 NYSID: 01897858L

Facility: GRVC Housing Area: 2A

**Missed Visit Type**

Missed Visit type? Nursing

The following services were missed (Nursing): Nursing Services Other

**Missed Visit Comments**

What was the reason for missed visit? Not Produced

Signed By: Surajbali, Charlotte at 1/11/2022 4:05:04 PM

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## Correctional Health Services

**Patient Name:**  
ALEXANDER WILLIAMS  
**NYSID:**  
01897858L

**Latest Book and Case#:**  
1411801632  
**Patient Facility:**  
GRVC

**Form Name:** MH - PsychMeds Bridge  
**Form Obs:** MH - PsychMeds Bridge

### MH - PsychMeds Bridge

**Patient:** ALEXANDER WILLIAMS **DOB:** 02/08/1981 **Age:** 40 Years Old  
**Book & Case #:** 1411801632 **NYSID:** 01897858L  
**Facility:** GRVC **Housing Area:** 2A

### PsychMeds Bridge

**The following services were missed:** Psych Medication Re-Evaluation

**Reason patient is being bridged:** Not Produced

**Date of last Psychiatry Medication Reevaluation:**

MH - Psychiatry - Medication Reevaluation (12/06/2021 3:38:39 PM)

**Number of previous consecutive bridges prior to this visit:** 0

**Percent compliance with individual's medications since last prescription (Type medication name and % compliance):** Benadryl and melatonin = 100%

**Relevant clinical information:** BO x 10 days with patient follow up scheduled next week.

### **Current Medications:**

PSEUDOEPHEDRINE HCL 30 MG (SUDAFED 30 MG) (PSEUDOEPHEDRINE HCL) 1 tab bid; Route: ORAL

DIPHENHYDRAMINE (PSYCH) 50 MG (BENADRYL (PSYCH) 50 MG) (DIPHENHYDRAMINE HCL) 50mg QHS; Route: ORAL

MELATONIN 1 MG (MELATONIN) 2mg QHS; Route: ORAL

ALBUTEROL 90 MCG / 1 INH (VENTOLIN / PROVENTIL HFA 90 MCG / (ALBUTEROL SULFATE) 2 puff q 6 hours prn; Route: INHALATION

BECLOMETHASONE DIP HFA 80 MCG (QVAR REDHALER HFA 80 MCG) (BECLOMETHASONE DIPROP HFA) 1 puff bid; Route: INHALATION

### **New Medications:**

DIPHENHYDRAMINE (PSYCH) 50 MG (BENADRYL (PSYCH) 50 MG) (DIPHENHYDRAMINE HCL) 50mg QHS; Route: ORAL

MELATONIN 1 MG (MELATONIN) 2mg QHS; Route: ORAL

### **ALL - Missed Visit**

**Patient:** ALEXANDER WILLIAMS **DOB:** 02/08/1981 **Age:** 40 Years Old  
**Book & Case #:** 1411801632 **NYSID:** 01897858L  
**Facility:** GRVC **Housing Area:** 2A

### **Missed Visit Type**

**The following services were missed (Psych Meds)** Psych Medication Re-Evaluation

### **Missed Visit Comments**

**What was the reason for missed visit?** Not Produced



# Correctional Health Services

**Patient Name:**

ALEXANDER WILLIAMS

**NYSID:**

01897858L

**Latest Book and Case#:**

1411801632

**Patient Facility:**

GRVC

**Date and Time Encounter Created:** January 13, 2022 5:16 PM

Signed By: Burns, Brian at 1/13/2022 5:18:09 PM

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## Correctional Health Services

**Patient Name:**

ALEXANDER WILLIAMS

**NYSID:**

01897858L

**Latest Book and Case#:**

1411801632

**Patient Facility:**

WF

**ALL - Missed Visit**

Patient: ALEXANDER WILLIAMS DOB: 02/08/1981 Age: 40 Years Old

Book & Case #: 1411801632 NYSID: 01897858L

Facility: WF Housing Area: CDU6

**Missed Visit Type**

Missed Visit type? Nursing

The following services were missed (Nursing): Nursing Services Other

**Missed Visit Comments**

Date of scheduled visit? 01/19/2022

What was the reason for missed visit? Not Produced

Missed visit comments: pt was not produced by DOC

**Date and Time Encounter Created:** January 19, 2022 11:07 AM

Signed By: Dixon, Shatoya at 1/19/2022 11:08:33 AM

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# Correctional Health Services

**Patient Name:**

ALEXANDER WILLIAMS

**NYSID:**

01897858L

**Latest Book and Case#:**

1411801632

**Patient Facility:**

GRVC

**ALL - Missed Visit**

Patient: ALEXANDER WILLIAMS DOB: 02/08/1981 Age: 40 Years Old

Book & Case #: 1411801632 NYSID: 01897858L

Facility: GRVC Housing Area: 2A

**Missed Visit Type**

Missed Visit type? Specialty - On-Site

The following services were missed (Specialty): Podiatry

**Missed Visit Comments**

Date of scheduled visit? 01/28/2022

What was the reason for missed visit? Not Produced

Missed visit comments: Patient was not seen in (not produced to) West Facility Podiatry clinic on 1/28/22.

**Date and Time Encounter Created:** January 28, 2022 3:16 PM

Signed By: Goldberg, Allan at 1/28/2022 3:17:04 PM



# Correctional Health Services

**Patient Name:**  
ALEXANDER WILLIAMS  
**NYSID:**  
01897858L

**Latest Book and Case#:**  
1411801632  
**Patient Facility:**  
GRVC

## **ALL - Missed Visit**

Patient: ALEXANDER WILLIAMS DOB: 02/08/1981 Age: 41 Years Old  
Book & Case #: 1411801632 NYSID: 01897858L  
Facility: GRVC Housing Area: 2A

## **Missed Visit Type**

Missed Visit type? Medical

The following services were missed (Medical): Medical Follow-Up

## **Missed Visit Comments**

Date of scheduled visit? 02/14/2022

What was the reason for missed visit? Not Produced

**Date and Time Encounter Created:** February 15, 2022 10:12 AM

Signed By: Persaud, Bryan at 2/15/2022 10:12:56 AM

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# Correctional Health Services

**Patient Name:**  
ALEXANDER WILLIAMS  
**NYSID:**  
01897858L

**Latest Book and Case#:**  
1411801632  
**Patient Facility:**  
GRVC

## **ALL - Missed Visit**

Patient: ALEXANDER WILLIAMS DOB: 02/08/1981 Age: 41 Years Old  
Book & Case #: 1411801632 NYSID: 01897858L  
Facility: GRVC Housing Area: 2A

## **Missed Visit Type**

Missed Visit type? Nursing

The following services were missed (Nursing): Nursing Follow-Up

## **Missed Visit Comments**

Date of scheduled visit? 03/02/2022

What was the reason for missed visit? Not Produced

Missed visit comments: patient not produced by DOC.

**Date and Time Encounter Created:** March 2, 2022 3:04 PM

Signed By: Okon, Linnette at 3/2/2022 3:05:00 PM



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## Correctional Health Services

**Patient Name:**

ALEXANDER WILLIAMS

**NYSID:**

01897858L

**Latest Book and Case#:**

1411801632

**Patient Facility:**

GRVC

**ALL - Missed Visit**

Patient: ALEXANDER WILLIAMS DOB: 02/08/1981 Age: 41 Years Old

Book & Case #: 1411801632 NYSID: 01897858L

Facility: GRVC Housing Area: 2A

**Missed Visit Type**

Missed Visit type? Specialty - On-Site

The following services were missed (Specialty): Podiatry

**Missed Visit Comments**

Date of scheduled visit? 03/08/2022

What was the reason for missed visit? Not Produced

Missed visit comments: Patient was not produced to (not seen in) West Facility Podiatry clinic on 3/8/22.

**Date and Time Encounter Created:** March 8, 2022 4:36 PM

Signed By: Goldberg, Allan at 3/8/2022 4:37:01 PM

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# Correctional Health Services

**Patient Name:**  
ALEXANDER WILLIAMS  
**NYSID:**  
01897858L

**Latest Book and Case#:**  
1411801632  
**Patient Facility:**  
GRVC

## ALL - Missed Visit

Patient: ALEXANDER WILLIAMS DOB: 02/08/1981 Age: 41 Years Old  
Book & Case #: 1411801632 NYSID: 01897858L  
Facility: GRVC Housing Area: 2A

## Missed Visit Type

Missed Visit type? Nursing

The following services were missed (Nursing): Nursing Services Other

## Missed Visit Comments

Date of scheduled visit? 03/16/2022

What was the reason for missed visit? Not Produced

Missed visit comments: Pt was not produced by DOC.

**Date and Time Encounter Created:** March 16, 2022 7:49 AM

Signed By: Sampeur, Marie at 3/16/2022 7:50:20 AM



# Correctional Health Services

**Patient Name:**  
ALEXANDER WILLIAMS  
**NYSID:**  
01897858L

**Latest Book and Case#:**  
1411801632  
**Patient Facility:**  
GRVC

## ALL - Missed Visit

Patient: ALEXANDER WILLIAMS DOB: 02/08/1981 Age: 41 Years Old  
Book & Case #: 1411801632 NYSID: 01897858L  
Facility: GRVC Housing Area: 2A

## Missed Visit Type

Missed Visit type? Nursing

The following services were missed (Nursing): Nursing Follow-Up

## Missed Visit Comments

Date of scheduled visit? 03/16/2022

What was the reason for missed visit? Not Produced

Missed visit comments: LABS

**Date and Time Encounter Created:** March 16, 2022 9:14 PM

Signed By: Blount, Jacqueline at 3/16/2022 9:14:59 PM

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# Correctional Health Services

**Patient Name:**  
ALEXANDER WILLIAMS  
**NYSID:**  
01897858L

**Latest Book and Case#:**  
1411801632  
**Patient Facility:**  
GRVC

## ALL - Missed Visit

Patient: ALEXANDER WILLIAMS DOB: 02/08/1981 Age: 41 Years Old  
Book & Case #: 1411801632 NYSID: 01897858L  
Facility: GRVC Housing Area: 2A

## Missed Visit Type

Missed Visit type? Nursing

The following services were missed (Nursing): Nursing Services Other

## Missed Visit Comments

Date of scheduled visit? 03/23/2022

What was the reason for missed visit? Not Produced

Missed visit comments: Pt was not produced by DOC.

**Date and Time Encounter Created:** March 30, 2022 7:39 AM

Signed By: Sampeur, Marie at 3/30/2022 7:39:53 AM

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# Correctional Health Services

**Patient Name:**  
ALEXANDER WILLIAMS  
**NYSID:**  
01897858L

**Latest Book and Case#:**  
1411801632  
**Patient Facility:**  
GRVC

## **ALL - Missed Visit**

Patient: ALEXANDER WILLIAMS DOB: 02/08/1981 Age: 41 Years Old  
Book & Case #: 1411801632 NYSID: 01897858L  
Facility: GRVC Housing Area: 2A

## **Missed Visit Type**

**Missed Visit type?** Nursing

**The following services were missed (Nursing):** Nursing Services Other

## **Missed Visit Comments**

**Date of scheduled visit?** 04/06/2022

**What was the reason for missed visit?** Not Produced

**Missed visit comments:** Pt was not produced by DOC.

**Date and Time Encounter Created:** April 6, 2022 7:44 AM

Signed By: Sampeur, Marie at 4/6/2022 7:45:06 AM

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# Correctional Health Services

**Patient Name:**  
ALEXANDER WILLIAMS  
**NYSID:**  
01897858L

**Latest Book and Case#:**  
1411801632  
**Patient Facility:**  
GRVC

## ALL - Missed Visit

Patient: ALEXANDER WILLIAMS DOB: 02/08/1981 Age: 41 Years Old  
Book & Case #: 1411801632 NYSID: 01897858L  
Facility: GRVC Housing Area: 2A

## Missed Visit Type

Missed Visit type? MH Visit

The following services were missed (MH Visit): TPR and Clinician Progress Note

## Missed Visit Comments

Date of scheduled visit? 04/08/2022

What was the reason for missed visit? Not Produced

Missed visit comments: Pt requested to have his session rescheduled due to his complaint of not being afforded privacy on the unit. DOC noted efforts will be made to secure a key to an interview room located outside the unit for future encounters. Pt was thus rescheduled.

**Date and Time Encounter Created:** April 8, 2022 10:27 PM

Signed By: Whittingham, Phillip at 4/8/2022 10:30:41 PM



# Correctional Health Services

**Patient Name:**  
ALEXANDER WILLIAMS  
**NYSID:**  
01897858L

**Latest Book and Case#:**  
1411801632  
**Patient Facility:**  
GRVC

## **ALL - Missed Visit**

Patient: ALEXANDER WILLIAMS DOB: 02/08/1981 Age: 41 Years Old  
Book & Case #: 1411801632 NYSID: 01897858L  
Facility: GRVC Housing Area: 2A

## **Missed Visit Type**

Missed Visit type? Medical

The following services were missed (Medical): Medical Follow-Up

## **Missed Visit Comments**

Date of scheduled visit? 04/21/2022

What was the reason for missed visit? Not Produced

**Date and Time Encounter Created:** April 25, 2022 6:37 AM

Signed By: Gaston, Noelle at 4/25/2022 6:37:36 AM



NYC  
HEALTH+  
HOSPITALS

## Correctional Health Services

**Patient Name:**  
ALEXANDER WILLIAMS  
**NYSID:**  
01897858L

**Latest Book and Case#:**  
1411801632  
**Patient Facility:**  
GRVC

### ALL - Missed Visit

Patient: ALEXANDER WILLIAMS DOB: 02/08/1981 Age: 41 Years Old  
Book & Case #: 1411801632 NYSID: 01897858L  
Facility: GRVC Housing Area: 2A

### Missed Visit Type

Missed Visit type? Specialty - On-Site  
The following services were missed (Specialty): Podiatry

### Missed Visit Comments

Date of scheduled visit? 05/23/2022  
What was the reason for missed visit? Not Produced  
Missed visit comments: np # 3 by doc on 4-28-22 r/s to 5-23-22--routine podiatry

**Date and Time Encounter Created:** April 29, 2022 1:27 PM

Signed By: Ward, Natalie at 4/29/2022 1:27:57 PM



# Correctional Health Services

**Patient Name:**  
ALEXANDER WILLIAMS  
**NYSID:**  
01897858L

**Latest Book and Case#:**  
1411801632  
**Patient Facility:**  
GRVC

## **ALL - Missed Visit**

Patient: ALEXANDER WILLIAMS DOB: 02/08/1981 Age: 40 Years Old  
Book & Case #: 1411801632 NYSID: 01897858L  
Facility: GRVC Housing Area: 2A

## **Missed Visit Type**

**Missed Visit type?** Nursing

**The following services were missed (Nursing):** Nursing Follow-Up

## **Missed Visit Comments**

**Date of scheduled visit?** 01/26/2022

**What was the reason for missed visit?** Not Produced

**Missed visit comments:** patient not produced by DOC.

**Date and Time Encounter Created:** January 26, 2022 2:36 PM

Signed By: Okon, Linnette at 1/26/2022 2:36:24 PM



# Correctional Health Services

**Patient Name:**  
ALEXANDER WILLIAMS  
**NYSID:**  
01897858L

**Latest Book and Case#:**  
1411801632  
**Patient Facility:**  
GRVC

**Form Name:** MH - PsychMeds Bridge  
**Form Obs:** MH - PsychMeds Bridge

## MH - PsychMeds Bridge

ALEXANDER WILLIAMS

GRVC  
**DOB:**  
02/08/1981  
**NYSID:**  
01897858L  
**Book and Case:**  
1411801632

## PsychMeds Bridge

**Reason patient is being bridged:** CHS administratively cancelled

**Number of previous consecutive bridges prior to this visit:** 1

**Percent compliance with individual's medications since last prescription (Type medication name and % compliance):** 94%

**Relevant clinical information:** Last psych f/u 3/27; seen by MHC on 4/29 for threatening self-injurious behavior; per DOC, pts housed in ESH unable to be produced for f/u. Will therefore bridge current Rx to prevent interruption in care until can be seen for psych f/u.

### Current Medications:

ARIPIRAZOLE 5 MG (ABILIFY 5 MG) (ARIPIRAZOLE) take 5 mg by mouth at bedtime  
Route: ORAL

MELATONIN 1 MG (MELATONIN) take 2 mg by mouth at bedtime Route: ORAL

ALBUTEROL 90 MCG / 1 INH (VENTOLIN / PROVENTIL HFA 90 MCG / (ALBUTEROL SULFATE) 2 puff  
q 6 hours prn; Route: INHALATION

BECLOMETHASONE DIP HFA 80 MCG (QVAR REDHALER HFA 80 MCG) (BECLOMETHASONE  
DIPROP HFA) 1 puff bid.; Route: INHALATION

### New Medications:

ARIPIRAZOLE 5 MG (ABILIFY 5 MG) (ARIPIRAZOLE) take 5 mg by mouth at bedtime  
Route: ORAL

MELATONIN 1 MG (MELATONIN) take 2 mg by mouth at bedtime Route: ORAL

Signed By: Rosenberg, David at 5/12/2021 2:13:16 PM



# Correctional Health Services

**Patient Name:**

ALEXANDER WILLIAMS

**NYSID:**

01897858L

**Latest Book and Case#:**

1411801632

**Patient Facility:**

GRVC

Signed By: Marinez, Kati at 7/14/2021 2:05:32 PM

NYC  
HEALTH+  
HOSPITALS

# Correctional Health Services

**Patient Name:**  
ALEXANDER WILLIAMS  
**NYSID:**  
01897858L

**Latest Book and Case#:**  
1411801632  
**Patient Facility:**  
GRVC

## MED - Assessment & Plan

Patient: **ALEXANDER WILLIAMS** DOB: **02/08/1981** Age: **40 Years Old**  
Book & Case #: **1411801632** NYSID: **01897858L**  
Facility: **GRVC** Housing Area: **2A**

### Allergy Review

\* **PEPPER (Severe)**  
**Seafood (Moderate)**

Allergies reviewed:  
**YES**

### Assessment:

#### **Problem # 1:**

Cavernous hemangioma - liver (ICD-228.04) (ICD10-D18.03)

Patient was scheduled to see TELEHEALTH SURGERY FROM TODAY BUT WAS NOT  
PRODUCED BY DOC FOR HIS  
TELEHEALTH SURGERY

#### Summary:

**Form Name** MED - Telehealth Services

**Form Obs:** MED - Telehealth Services

MED - Telehealth Services

ALEXANDER WILLIAMS

GRVC

### **Telehealth Services**

**Visit Type:** Bellevue/Elmhurst specialty

**Date and Time Encounter Created:** November 3, 2021 4:13 PM

Signed By: Comas, Carole at 11/6/2021 12:52:03 PM

Correctional Health Services  
55 Water Street 18th Fl  
New York, NY 10041

5/16/2022

Order Form

## REFERRAL ORDER

<b>Authorizing Provider:</b>	Vanessa Jones PA	<b>Service Provider:</b>	CHS
<b>Auth Provider NPI:</b>	1134355811		
<b>Signing Provider:</b>	Vanessa Jones PA		
<b>Phone:</b>		<b>Phone:</b>	
<b>Fax:</b>		<b>Fax:</b>	
<b>Patient Name:</b>	ALEXANDER WILLIAMS	<b>DOB:</b>	Feb 08, 1981
<b>Home Phone:</b>		<b>Sex:</b>	Male
<b>Work Phone:</b>		<b>Cell Phone:</b>	
<b>Resp. Provider:</b>		<b>Age:</b>	41
		<b>SSN:</b>	069687499
		<b>Patient ID:</b>	21917
<b>Primary Ins:</b>		<b>Secondary Ins:</b>	
<b>Group:</b>		<b>Group:</b>	
<b>Policy:</b>		<b>Policy:</b>	
<b>Insured ID:</b>		<b>Insured ID:</b>	

Code

BELLESURGERY

**Order Number:****Authorization #:****Start Date:****Electronically signed by:** Vanessa Jones PA**Instructions:**Description

Referral - Bellevue, Surgery

1068218-2

P-2 11/3

11/03/2021

Vanessa Jones PA

40 y o m seen in ED on 1/8/20 for cholecystitis. Seen again on 5/23/21 and recommended to have US of liver prior to being scheduled for elective surgery.

Pt had CT w contrast of Abd/Pel on 5/23.

Impression:

Normally distended gallbladder. No biliary dilation. No significant pericholecystic fluid. No radiopaque

cholelithiasis. No CT evidence of acute cholecystitis.

No acute abdominal/pelvic pathology.

US of Liver (7/7/21)

IMPRESSION: ABNORMAL

\* Cholelithiasis without evidence of acute cholecystitis.

\* 3.6 cm left hepatic hemangioma.

Please evaluate patient.

Diagnoses

CAVERNOUS HEMANGIOMA, LIVER (ICD-D18.03)

**Quantity:** 1**Priority:****End Date:** 01/02/2041**Signed on:** 7/13/2021 12:21:56 PM

# EXHIBIT – I





# CORRECTION DEPARTMENT CITY OF NEW YORK



## INMATE VOLUNTARY STATEMENT FORM

 Form: IVS-1  
Eff.: 1/24/19

Inmate's Name:

Khatne Thompson

Date:

Oct 10, 2022

Book and Case Number:

349-190-1450

Date of Birth:

Age:

47

Housing Area:

2a

I hereby acknowledge that the following written statement issued was made VOLUNTARILY of my own free will without promise of reward, or under any threat of physical harm or fear of such. Additionally, you will not be subject to any form of retaliation for providing information in connection with this investigation by the New York City Department of Correction.

TODAY AT ROUGHLY 9:30AM CAPTAIN GANIUS FROM SECURITY WAS IN MY UNIT ON 2A AND I WITNESS HER THREATEN INMATE ALEXANDER WILLIAMS IN REGARDS TO HER WANTING HIM TO STOP SALING HIS BOOK THAT HAD HER NAME MENTIONED IN IT. I THEN HEARD THIS CAPTAIN STATE THAT SHOULD SET HIM UP WITH FAKE CHARGES BECAUSE THE BRONX DA IS TIRED OF YOU JAIL NIGGA AND THAT THE OFFICER PRESENT BETTER WRITE WHATEVER SHE WANT ON THE REPORT OR THEY WILL NO LONGER HAVE 2A AS A POST IF THEY DIDNT. ALL OF THIS IS ON CAMERA SHE THEN TOLD INMATE WILLIAM TO EAT HER PUSSY BY WAY OF "LICK HER CLICK ON GOOD AND BAD DAYS". SHE WENT ON TO STATE THAT SHE WAS GOING TO HAVE CO'S FROM THE FACILITY PULL UP TO THE PLATFORM AND RUSH THE CELL OF INMATE WILLIAMS AND F\*CK HIM, SOMETHING THAT SHE IS KNOWN TO HAVE DONE WITHIN THE FACILITY OF GRVC. EVERYONE KNOWS THAT SHE BEAT UP A CAPTAIN IN THE PAST AND WAS ONLY SUSPENDED AND THAT SHE HAS A REPUTATION FOR VIOLENCE AND SETTING INMATES AND CORRECTIONAL OFFICERS UP.

Inmate's Signature:

Date:

OCT 10, 2022

Witness by (print name):

CG # LAWERENCE

Witness Signature:

Lawrence

Rank:

# CG

Shield Number:

10351

# EXHIBIT –J



RECEIVED 01/18/2019 05:54

FBI

Jan 18 2019 08:47am P001/003

01/18/2019 08:00

4555 P-001/003

		<b>CORRECTION DEPARTMENT CITY OF NEW YORK</b>			
<b>OPERATIONS DIVISION OPERATION SECURITY INTELLIGENCE UNIT</b>					
<b>C.M.C. INFORMATION SHEET</b>					
<b>DATE:</b> January 17, 2019			<b>PREPARED BY:</b> CO R. Jones #2472		
<b>TO:</b> COMMANDING OFFICER MDC			<b>AUTHORIZED:</b> P. RENDY Cpt. #572		
<b>SUBJECT:</b> <input checked="" type="checkbox"/> DESIGNATION OF C.M.C. INMATE <input type="checkbox"/> C.M.C. INMATE RE-ACT <input type="checkbox"/> TRANSFER OF C.M.C. INMATE <input type="checkbox"/> REMOVAL FROM C.M.C. STATUS			<b>CMC #</b> 11/19  <b>TYPE:</b> LOCKDOWN		
<b>INMATE LAST NAME</b> WILLIAMS			<b>INMATE'S FIRST NAME</b> ALEXANDER		
<b>BOOK &amp; CASE #</b> 141-18-01692		<b>NYSID#</b> 01897806L		<b>DOCKET/INMATEMENT #</b> 2018KIN013179-02146/2018	
<b>BAIL STATUS</b> RECEIVED		<b>CHANGE (S)</b> 125.25			
<input checked="" type="checkbox"/> INMATE IS DESIGNATED AS A CENTRALLY MONITORED INMATE. PLEASE REFER TO TELETYPE ORDER NO. 4555 FOR OFFICIAL DESIGNATION.					
<input checked="" type="checkbox"/> INMATE SHALL BE HOUSED IN THE FOLLOWING FACILITY:					
<input type="checkbox"/> BMTV <input type="checkbox"/> CPSU <input type="checkbox"/> RMSC <input type="checkbox"/> MIC <input type="checkbox"/> AMKC <input type="checkbox"/> BXDC <input type="checkbox"/> ORVC <input type="checkbox"/> OBCC <input type="checkbox"/> RNDG <input type="checkbox"/> BMYC <input type="checkbox"/> JATC <input type="checkbox"/> QDC <input type="checkbox"/> BHPW <input type="checkbox"/> BHPW <input type="checkbox"/> WEST <input type="checkbox"/> QMDC <input type="checkbox"/> BDMC <input type="checkbox"/> VCSC <input type="checkbox"/> OTHER					
<input checked="" type="checkbox"/> INMATE SHALL BE PLACED IN THE FOLLOWING HOUSING ASSIGNMENT:					
<input type="checkbox"/> GENERAL POPULATION <input type="checkbox"/> PROTECTIVE CUSTODY <input type="checkbox"/> MENTAL OBSERVATION <input type="checkbox"/> GENERAL POPULATION ESCORT <input type="checkbox"/> MAHUT <input checked="" type="checkbox"/> CMC <input type="checkbox"/> MAXIMUM SECURITY <input type="checkbox"/> LOCKDOWN <input type="checkbox"/> MEDICAL <input type="checkbox"/> ADMIN. SEGREGATION <input type="checkbox"/> PUNITIVE SEGREGATION					
<input type="checkbox"/> INMATE IS REMOVED FROM C.M.C. STATUS EFFECTIVE ____/____/____ PLEASE REFER TO TELETYPE ORDER NO. ____ FOR OFFICIAL REVOCATION.					
<input type="checkbox"/> THE INFORMATION CONTAINED ON THE REVERSE SIDE OF THIS FORM IS FORWARDED FOR YOUR REVIEW AND APPROPRIATE ACTION (S).					
<b>SECURITY REQUIREMENTS:</b>					
<input checked="" type="checkbox"/> WAIST CHAINS TO BE WORN WHEN OUTSIDE THE FACILITY <input checked="" type="checkbox"/> LEG IRONS TO BE WORN WHEN OUTSIDE THE FACILITY <input type="checkbox"/> SPECIAL TRANSPORTATION IS REQUIRED WHEN MOVING THIS INMATE <input type="checkbox"/> TRANSPORT BY EMERGENCY SERVICE UNIT ONLY <input checked="" type="checkbox"/> TRANSPORT BY TRANSPORTATION DIVISION ONLY <input type="checkbox"/> TRANSPORT BY TRANSPORTATION, UNLESS THE MOVE IS UNSCHEDULED THEN E.S.U. WILL TRANSPORT <input type="checkbox"/> INTER-FACILITY SECURITY RESTRAINTS					
NOTE: DUE PROCESS SAFEGUARDS AND HEARINGS ARE REQUIRED IF THIS PLACEMENT IS INVOLUNTARY/SECURITY REASONS.			SEE REVERSE SIDE INFORMATION		

DEF\_0923

RECEIVED 01/18/2019 05:54  
 Fax: Jan 18 2019 08:47am P002/003  
 01/18/2019 05:54 0000 P.002/003

From: [REDACTED]

REASON FOR C.N.C. DESIGNATION:  
 SUBJECT IS A COURT ORDERED LOCKDOWN

EVIDENCE/DOCUMENTATION UTILIZED:  
 ON FILE AT OSRU

OPERATIONS:

THE FOLLOWING TELEPHONE NOTIFICATIONS WERE MADE REGARDING THIS DOCUMENT:

DATE	TIME	PERSON NOTIFIED	TITLE	FACILITY
1/15/19	HOURS	SECURITY EXT. 118 451 8942		SEC
1/15/19	HOURS	GO-EXT. 46 141 8915		SEC
1/15/19	HOURS	SECURITY EXT. 218 225 1001		SEC
1/15/19	HOURS	GO-EXT. 218 225 1515		NBC
1/15/19	HOURS			
1/15/19	HOURS			

NOTIFICATION MADE BY: LAST NAME FIRST NAME RANK SHIELD  
 JONES R CO 8472

COPIES OF THIS DOCUMENT FORWARDED TO:

☐ CLASSIFICATION UNIT  
☐ ESU  
☒ FACILITY  
☐ INVESTIGATION DIVISION  
☐ TRANSPORTATION DIVISION  
☐ OTHER



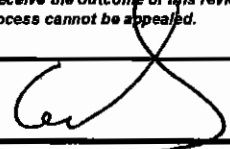
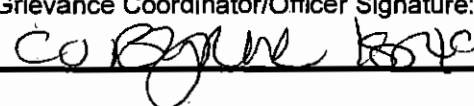
REMARKS:

DEF\_0924

# EXHIBIT – K



ATTACHMENT - C

2A

	<b>CITY OF NEW YORK - DEPARTMENT OF CORRECTION</b>		
	<b>OFFICE OF CONSTITUENT AND GRIEVANCE SERVICES</b>		
	<b>DISPOSITION FORM</b>		
Grievance Reference # 590724		Date Filed: 10/07/22	Facility: GRVC 2A
Inmate Name: Williams, Alexander		Book and Case: 1411801632	Category: N.G. Staff Complaint
<p>From OCGS Inmate Statement Form, print or type short description of grievance:</p> <p>On the above date Co K White, CO Andre Hickson, and Captain Gaines entered housing unit at 11:45 am and stated to me that you are suing me, and I will kill you and make sure you get life in prison. (CO Kevin White and CO Andre Hickson) Captain Gaines commented, stated that she was specifically going to make sure that all communication with my attorneys were cut because they are causing too many issues, investigating DO</p>			
Action Requested by Inmate: <u>Stop retaliation conduct before it affects, litigation and /or exacerbates to being physical.</u>			
<p align="center"><b>STEP 1: FORMAL RESOLUTION</b></p> <p>Check one box: <input type="checkbox"/> Grievance <input checked="" type="checkbox"/> Submission is not subjected to the Grievance Process</p> <p>The Office of Constituent and Grievance Services proposes to formally resolve your grievance as follows below. Alternatively, OCGS staff shall provide an explanation for why the submission is not subject to the OCGS process.</p> <p>The grievant has been informed his complaint has been forwarded to facility leadership for review.</p>			
<p align="center"><b>CHECK THE APPROPRIATE BOX BELOW AND PROVIDE YOUR SIGNATURE</b> (Failure to sign forms will forgo your right to appeal the proposed resolution.)</p> <p><input type="checkbox"/> Yes, I accept the resolution <input type="checkbox"/> No <input type="checkbox"/> I request to appeal the resolution of this grievance to the Commanding officer.</p> <p><small>Note: If you appeal, the grievance staff can request for a preliminary based review if they feel the complaint was thoroughly investigated and addressed, prior to forwarding to the Commanding Officer. You will receive the outcome of this review within (3) business days to inform you the appeal will proceed or you exhausted administrative remedies. Grievance not subject to the Grievance Process cannot be appealed.</small></p>			
Inmate's Signature: 		Date: 09/27/22	
<input type="checkbox"/> Preliminary Review Requested			
Grievance Coordinator/Officer Signature: 		Date: 09/27/22	



## ATTACHMENT -B-1

 <b>CITY OF NEW YORK - DEPARTMENT OF CORRECTION</b> 		
<b>OFFICE OF CONSTITUENT AND GRIEVANCE SERVICES</b> <b>INMATE STATEMENT FORM</b>		Form.: 7101R-A Eff.: 9/14/18 Ref.: Dir. 3376R-A
Inmate's Name: <u>Alexander Williams</u>		Book & Case #: <u>1411801632</u>
Facility: <u>GRVC</u>		NYSID #: <u>018978586</u>
Housing Area: <u>21</u>	Date of Incident: <u>1/30/2022</u>	Date Submitted: <u>9/30/2022</u>
<p>All grievances must be submitted within ten business days after the incident occurred, unless it's a sexual abuse or harassment allegation. The inmate filing the grievance must personally prepare this statement. Upon collection by the Office of Constituent and Grievance Services (OCGS) staff, OCGS staff will time-stamp and issue it a grievance reference number. OCGS staff shall provide the inmate with a copy of this form as a record of receipt.</p>		
Grievance: <u>on date above CO White, CO Andre Hickson and Captain Gaines entered housing unit at 11:45 am and stated to me that you are suing me and I will kill you and make sure you get life in prison. (CO Kevin White and CO Andre Hickson) Captain Gaines commented stating that she was specifically going to make sure that all communication with my attorneys were cut because they are causing too much issues investigating DOC</u>		
Action Requested by Inmate: <u>Stop this retaliation conduct before it affects my litigation and/or exacerbates to being physical</u>		
Please read below and check the correct box:		
Do you agree to have your statement edited for clarification by OCGS staff?		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Do you need the OCGS staff to write the grievance for you?		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Have you filed this grievance with a court or other agency?		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Did you require the assistance of an interpreter?		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Inmate's Signature: <u>Alexander Williams</u>		Date of Signature: <u>9/30/2022</u>
FOR DOC OFFICE USE ONLY		
OCGS MUST PROVIDE A COPY OF THIS FORM TO THE INMATE AS A RECORD OF RECEIPT.		
THIS FORM IS INVALID UNLESS SIGNED BY THE INMATE AND GRIEVANCE COORDINATOR		
TIME STAMP  <u>2022 OCT -7 P 1:34</u>	Grievance Reference # <u>590724</u>	Category: <u>STAFF COMPLAINT</u>
Office of Constituent and Grievances Services Coordinator/Officer Signature: <u>Byron 18049</u>		

10/11



# EXHIBIT – L

ATTACHMENT - C

**CITY OF NEW YORK - DEPARTMENT OF CORRECTION****OFFICE OF CONSTITUENT AND GRIEVANCE SERVICES**Form.: 7102R  
Eff.: 8/23/19  
Ref.: Dir. 3376R-A**DISPOSITION FORM**

Grievance Reference # 590747

Date Filed: 10/07/22

Facility: GRVC 2A

Inmate Name: Williams, Alexander

Book and Case: 1411801632

Category: N.G.  
Staff Complaint

From OCGS Inmate Statement Form, print or type short description of grievance:  
At 6:45 pm Captain Gaines and CO Kevin came to housing unit 2A and stated to me I told you would not call your lawyer.  
(See attached)

Action Requested by Inmate: Please place an administration separation between me and Captain Gaines and Kevin Young.

**STEP 1: FORMAL RESOLUTION**

Check one box: ☐ Grievance ☒ Submission is not subjected to the Grievance Process

The Office of Constituent and Grievance Services proposes to formally resolve your grievance as follows below.  
Alternatively, OCGS staff shall provide an explanation for why the submission is not subject to the OCGS process.

The grievant has been informed his complaint has been forwarded to facility leadership for review.

**CHECK THE APPROPRIATE BOX BELOW AND PROVIDE YOUR SIGNATURE**

(Failure to sign forms will forgo your right to appeal the proposed resolution.)

☐ Yes, I accept the resolution ☐ No ☐ I request to appeal the resolution of this grievance to the Commanding officer.

Note: If you appeal, the grievance staff can request for a preliminary based review if they feel the complaint was thoroughly investigated and addressed, prior to forwarding to the Commanding Officer. You will receive the outcome of this review within (3) business days to inform you the appeal will proceed or you exhausted administrative remedies. Grievance not subject to the Grievance Process cannot be appealed.

Inmate's Signature:

Date: 10/07/22



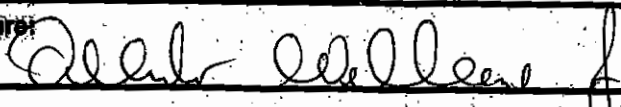
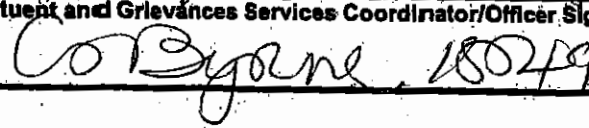
☐ Preliminary Review Requested

Grievance Coordinator/Officer Signature:

Date: 10/07/22

CO Byrne 18049



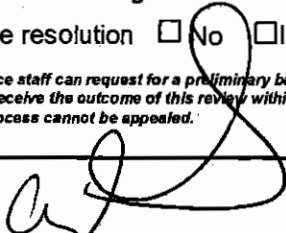

## ATTACHMENT-B-1

 <b>CITY OF NEW YORK - DEPARTMENT OF CORRECTION</b> 		
<b>OFFICE OF CONSTITUENT AND GRIEVANCE SERVICES</b> <b>INMATE STATEMENT FORM</b>		Form.: 7101R-A Eff.: 9/14/18 Ref.: Dir. 3376R-A
<b>Inmate Name:</b> Alexander Williams	<b>Book &amp; Case #:</b> 1461801632	<b>NYSID #:</b> 01997858C
<b>Facility:</b> C.RVC	<b>Housing Area:</b> 2a	<b>Date of Incident:</b> 9/30/2022
<b>Date Submitted:</b> 9/30/2022		
<p>All grievances must be submitted within ten business days after the incident occurred, unless it's a sexual abuse or harassment allegation. The inmate filing the grievance must personally prepare this statement. Upon collection by the Office of Constituent and Grievance Services (OCGS) staff, OCGS staff will time-stamp and issue it a grievance reference number. OCGS staff shall provide the inmate with a copy of this form as a record of receipt.</p>		
<b>Grievance:</b> at 6:45 PM captain gained and co Kevin came to housing unit 2a and stated to me I told you that you would not call your lawyer, you put my name on your book (the true untold story of New York City's notorious Rikers Island) you on my last you have no rights until you recall that book, co Kevin Yang interviewed and stated Fuck you and your lawsuit this caused me to be suicidal		
<b>Action Requested by Inmate:</b> please place a administrative separation between myself and captain gained and Kevin Yang		
<b>Please read below and check the correct box:</b>		
Do you agree to have your statement edited for clarification by OCGS staff?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Do you need the OCGS staff to write the grievance for you?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Have you filed this grievance with a court or other agency?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Did you require the assistance of an interpreter?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
<b>Inmate's Signature:</b> 	<b>Date of Signature:</b> 9/30/2022	
<b>FOR DOC OFFICE USE ONLY</b>		
<b>OCGS MUST PROVIDE A COPY OF THIS FORM TO THE INMATE AS A RECORD OF RECEIPT.</b>		
<b>THIS FORM IS INVALID UNLESS SIGNED BY THE INMATE AND GRIEVANCE COORDINATOR</b>		
<b>TIME STAMP</b> 10/11/22 7:10 PM	<b>Grievance Reference #</b> 590747	<b>Category:</b> Staff Complaint
<b>Office of Constituent and Grievance Services Coordinator/Officer Signature:</b> 		

10/11



# EXHIBIT -M

ATTACHMENT - C

	CITY OF NEW YORK - DEPARTMENT OF CORRECTION		
	OFFICE OF CONSTITUENT AND GRIEVANCE SERVICES	Form.: 7102R Eff.: 8/23/19 Ref.: Dir. 3376R-A	
	DISPOSITION FORM		
Grievance Reference # 590755		Date Filed: 10/07/22	Facility: GRVC 2A
Inmate Name: Williams, Alexander		Book and Case: 1411801632	Category: N.G. Staff Complaint
<p>From OCGS Inmate Statement Form, print or type short description of grievance:</p> <p>On Oct. 01, 2022, I was told by Captain Lundstrom that per Deputy Warden Philips and Captain Gaines I cannot call my attorney today. This caused me to think about killing myself. A physc report was generated.</p>			
<p>Action Requested by Inmate: Please do not limit, interfere or stop my line of communication with my state approved attorneys.</p>			
STEP 1: FORMAL RESOLUTION			
<p>Check one box: <input type="checkbox"/> Grievance     <input checked="" type="checkbox"/> Submission is not subjected to the Grievance Process</p> <p>The Office of Constituent and Grievance Services proposes to formally resolve your grievance as follows below. Alternatively, OCGS staff shall provide an explanation for why the submission is not subject to the OCGS process.</p> <p>The grievant has been informed his complaint has been forwarded to facility leadership for review.</p>			
CHECK THE APPROPRIATE BOX BELOW AND PROVIDE YOUR SIGNATURE			
(Failure to sign forms will forgo your right to appeal the proposed resolution.)			
<p><input type="checkbox"/> Yes, I accept the resolution    <input type="checkbox"/> No    <input type="checkbox"/> I request to appeal the resolution of this grievance to the Commanding officer.</p> <p><small>Note: If you appeal, the grievance staff can request for a preliminary based review if they feel the complaint was thoroughly investigated and addressed, prior to forwarding to the Commanding Officer. You will receive the outcome of this review within (3) business days to inform you the appeal will proceed or you exhausted administrative remedies. Grievance not subject to the Grievance Process cannot be appealed.</small></p>			
Inmate's Signature: 		Date: 10/07/22	
<input type="checkbox"/> Preliminary Review Requested			
Grievance Coordinator/Officer Signature: 		Date: 10/07/22	



## ATTACHMENT -B-1

 <b>CITY OF NEW YORK - DEPARTMENT OF CORRECTION</b> 	
<b>OFFICE OF CONSTITUENT AND GRIEVANCE SERVICES</b> <b>INMATE STATEMENT FORM</b>	
Form: 7101R-A Eff: 9/14/18 Ref: Dir. 3376R-A	
Inmate Name: <u>Alexander William</u>	Book & Case #: <u>1411801632</u>
Facility: <u>CRVC</u>	NYSID #: <u>01897858L</u>
Housing Area: <u>29</u>	Date of Incident: <u>10/1/2022</u>
Date Submitted: <u>10/1/2022</u>	
<p>All grievances must be submitted within ten business days after the incident occurred, unless it's a sexual abuse or harassment allegation. The inmate filing the grievance must personally prepare this statement. Upon collection by the Office of Constituent and Grievance Services (OCGS) staff, OCGS staff will time-stamp and issue it a grievance reference number. OCGS staff shall provide the inmate with a copy of this form as a record of receipt.</p>	
Grievance: <u>on Oct 1, 2022 I was told by Captain Lundsteen that per Deputy Warden Phillips and Captain Gaines I can not call my Attorney today. This caused me to think about killing myself. A physc report was generated.</u>	
Action Requested by Inmate: <u>please do not limit interller or stop my line of communication with my state approved Attorneys</u>	
Please read below and check the correct box:	
Do you agree to have your statement edited for clarification by OCGS staff?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Do you need the OCGS staff to write the grievance for you?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Have you filed this grievance with a court or other agency?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Did you require the assistance of an interpreter?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Inmate's Signature: <u>Alexander William</u>	Date of Signature: <u>10/1/2022</u>
FOR DOC OFFICE USE ONLY  OCGS MUST PROVIDE A COPY OF THIS FORM TO THE INMATE AS A RECORD OF RECEIPT.  THIS FORM IS INVALID UNLESS SIGNED BY THE INMATE AND GRIEVANCE COORDINATOR	
TIME STAMP: <u>10/1/22 - 7 P 1:30</u>	Grievance Reference #: <u>590755</u>
	Category: <u>Staff Complaint</u>
Office of Constituent and Grievances Services Coordinator/Officer Signature: <u>CO Byrne #18049</u>	

10/1/22

# EXHIBIT – N



TAPE# D18-0281

DAVID WALKER

12-8-18

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A.D.A. CHIN: Today is  
December 8th, 2018. This  
is tape number D18-0281.  
We're here in the Brooklyn  
District Attorney's office  
in the Homicide Bureaus.

Also present is Detective  
Michael Heyburt(sp?). The  
time right now is 3:31 P.M.  
What's your name, sir?

MR. WALKER: David  
Demetrial Walker.

A.D.A. CHIN: Okay. So  
Walker, my name is Ernest  
Chin. I'm an assistant  
district attorney in the  
Brooklyn DA's office and a  
notary public, qualified in  
the County of Kings. My  
number is 02CH6251538 and

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DAVID WALKER

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my commission expires  
November 14th, 2019. What  
I want to do is talk to you  
about is about a homicide  
that happened on June 27th,  
2011 in the area of  
Cosuseco(sp?) Street.  
Specifically, regarding an  
individual by the name of  
Alexander Williams. Before  
I talk to you, though, I'm  
going to ask you to swear  
or affirm that anything you  
tell me is the truth; do  
you understand?

MR. WALKER: Yes, sir.

A.D.A. CHIN: Okay. To do  
that, please raise your  
right hand. Do you, David  
Demetrial Walker, swear or  
affirm that the statement

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DAVID WALKER

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12-8-18

you're about to give is the  
truth?

MR. WALKER: Yes, sir.

A.D.A. CHIN: Okay, lower  
your hand, thank you. So  
let's talk about how you  
know an individual by the  
name of Alexander Williams;  
when'd you meet Alexander  
Williams?

MR. WALKER: When I was a  
child, probably about 17,  
18, probably about '97,  
'98, '99.

A.D.A. CHIN: Okay.

MR. WALKER: In South  
Carolina.

A.D.A. CHIN: How did you -  
- down where?

MR. WALKER: Bamberg, South  
Carolina.

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DAVID WALKER

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A.D.A. CHIN: Okay. And  
how did you meet him?

MR. WALKER: Just walking  
up the street, he was  
hanging out with another  
home boy of mine and we  
started smoking, hanging  
out like that.

A.D.A. CHIN: Okay. Now  
were you a Blood member?

MR. WALKER: Yes.

A.D.A. CHIN: Okay. And  
what sect of Blood's were  
you?

MR. WALKER: 135

Power(unintelligible).

A.D.A. CHIN: Okay.

MR. WALKER: Before that, I  
was G-shine.

A.D.A. CHIN: Okay. And  
during your interactions

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DAVID WALKER

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with Alexander Williams,  
did you know him by any  
other names?

MR. WALKER: No, just AB.

A.D.A. CHIN: Okay. There  
you go, that's what I'm  
getting at, AB, the letters  
A and B?

MR. WALKER: Almighty  
Blood.

A.D.A. CHIN: Okay. That's  
what it stands for?

MR. WALKER: Yeah.

A.D.A. CHIN: Almighty  
Blood?

MR. WALKER: Yeah.

A.D.A. CHIN: Okay. Do you  
know what sect of Blood's  
Alexander Williams belonged  
to?

MR. WALKER: He a Stony,

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DAVID WALKER

12-8-18

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Gorilla Stone Blood.

A.D.A. CHIN: Okay. And are you aware of where in the hierarchy he is?

MR. WALKER: To the top.

A.D.A. CHIN: Okay.

MR. WALKER: He - - they say he first on the streets, second in charge of the penitentiary.

A.D.A. CHIN: Okay. So he's first in charge in the streets, second in charge in prison?

MR. WALKER: Yeah.

A.D.A. CHIN: Okay. Now once you met up with Alexander Williams, what was the nature of your relationship?

MR. WALKER: Just running

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DAVID WALKER

12-8-18<sup>7</sup>

guns, bringing in guns to  
New York for some coke or  
something like that.

A.D.A. CHIN: Okay. So  
let's slow that down. So  
you met him around '97,  
'98, '99, somewhere - -  
time around that; is that  
correct?

MR. WALKER: Yes, sir, yes,  
sir.

A.D.A. CHIN: All right.  
And you would conduct  
criminal transactions with  
him?

MR. WALKER: Yes, sir, run  
guns.

A.D.A. CHIN: Run guns. So  
where would you run the  
guns to?

MR. WALKER: Uh, from - -



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DAVID WALKER

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A.D.A. CHIN: From and to.

MR. WALKER: From South  
Carolina to New York, from  
South Carolina to Maryland,  
from South Carolina to  
North Carolina.

A.D.A. CHIN: Okay. Where  
specifically in North  
Carolina?

MR. WALKER: Raleigh.

A.D.A. CHIN: Okay. And  
where specifically in  
Maryland?

MR. WALKER: Hagerstown.

A.D.A. CHIN: Okay. During  
these times when you say  
you would run guns; would  
you be with AB?

MR. WALKER: No, I  
basically will leave  
myself, and will leave them

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DAVID WALKER

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in those places, then we'll meet up and he'll come with probably four or five of his partners, and everybody guns, and then I'm gone and that's basically it.

A.D.A. CHIN: Okay. So you would meet up - -

MR. WALKER:

(Unintelligible) - -

A.D.A. CHIN: - - with AB at the time when the guns that were sold?

MR. WALKER: Yes, he's there.

A.D.A. CHIN: Okay.

MR. WALKER: Yes, he's the one bringing the clients to buy the guns.

A.D.A. CHIN: Okay. And how long did you wind up

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DAVID WALKER

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12-8-18

running these guns with AB?

MR. WALKER: From about '98

to, I don't know, I don't

know, man, probably about

'09, or something like

that.

A.D.A. CHIN: Okay. 2009,

so about ten years?

MR. WALKER: Yeah.

A.D.A. CHIN: How many

times did you run guns with

or for AB?

MR. WALKER: How many

times?

A.D.A. CHIN: Yeah.

MR. WALKER: How many

trips?

A.D.A. CHIN: How many

trips did you take?

MR. WALKER: Man, probably

about ten, fifteen.

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DAVID WALKER

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A.D.A. CHIN: Ten, fifteen trips?

MR. WALKER: Probably way over - - myself, me, myself, probably over 30, 40, 50 guns.

A.D.A. CHIN: Okay. 30, 40, 50 guns for you, yourself with AB?

MR. WALKER: All handguns.

A.D.A. CHIN: Okay. And AB would conduct these transactions himself?

MR. WALKER: Yes.

A.D.A. CHIN: Okay. And then how would he - - how would he pay you?

MR. WALKER: Cash, or either in product, mostly cash, though.

A.D.A. CHIN: What do you

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DAVID WALKER

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mean product?

MR. WALKER: Like, probably  
cocaine.

A.D.A. CHIN: Okay.

MR. WALKER: Or if I needed  
some little reefer, or  
something he's give me some  
reefer, marijuana.

A.D.A. CHIN: Okay. That's  
what he would do?

MR. WALKER: Yeah.

A.D.A. CHIN: Give you  
marijuana or cocaine as  
payment?

MR. WALKER: Yes, yeah.

A.D.A. CHIN: All right.  
You were basically a  
business partner of his?

MR. WALKER: Yes.

A.D.A. CHIN: Okay. Now I  
want to talk to you about

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DAVID WALKER

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2011, around the end of  
June and into, I guess  
early July. Did there come  
a time when you drove  
Alexander Williams to  
Hagerstown, Maryland?

MR. WALKER: Yes.

A.D.A. CHIN: Okay. Tell  
me what happened. So now  
you know that you're here  
in relation to a homicide  
that's being investigated,  
right?

MR. WALKER: Yes.

A.D.A. CHIN: Okay. And it  
involves something, in your  
words that you said before,  
where someone was fucking  
with AB's girl.

MR. WALKER: Girlfriend.

A.D.A. CHIN: Okay. So

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that's the homicide we're  
here talking about.

MR. WALKER: Yes.

A.D.A. CHIN: Okay. So tell  
me what happened around  
that time back in 2011 with  
regards to that.

MR. WALKER: We left my  
cousin house, Curtis  
Nimmons' house in  
Orangeburg, South Carolina,  
we drove to Maryland.

A.D.A. CHIN: Now you say  
you left your cousin's  
house, Curtis - -

MR. WALKER: Nimmons.

A.D.A. CHIN: Nimmons?

MR. WALKER: Yes.

A.D.A. CHIN: Okay.

MR. WALKER: We left his  
house, we went to Maryland,



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DAVID WALKER

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we stayed in Maryland about an hour, he gave me an AR-15, gave me four ounces of cocaine, then he left Maryland - - well I left Maryland, and he went to New York. About a week later, he came back down.

A.D.A. CHIN: Okay.

MR. WALKER: He came back down with a pound of weed.

A.D.A. CHIN: Now when you say he came back down, that's when he contacted you?

MR. WALKER: Yes.

A.D.A. CHIN: Okay. Do you know if he came back earlier, or later?

MR. WALKER: No, he probably did, he probably

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was someplace else, but he probably did.

A.D.A. CHIN: Okay. But what you're saying is that when you said he came back down, after he - -

MR. WALKER: He came back from the city, yeah.

A.D.A. CHIN: - - after - - a week after you left him at Maryland is when you spoke to him again?

MR. WALKER: Yes.

A.D.A. CHIN: Okay.

MR. WALKER: Yes.

A.D.A. CHIN: Do you know why he was going to New York?

MR. WALKER: No, I thought he was going to (unintelligible) - - with

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DAVID WALKER

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some heron(sic).

A.D.A. CHIN: Okay. When you say heron(sic), you mean heroin?

MR. WALKER: Yeah, heroin.

A.D.A. CHIN: Okay.

MR. WALKER: Yeah, that's how y'all say it, heroin?

A.D.A. CHIN: Yes, okay.

MR. WALKER: Yeah.

A.D.A. CHIN: Okay. I just want to be clear for the recording. All right. So a week after you drove him to Hagerstown, Maryland, where did he give you the AR-15 and the four ounces of coke?

MR. WALKER: In Hagerstown.

A.D.A. CHIN: Yeah, but where, like - -

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DAVID WALKER

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MR. WALKER: In his house.

A.D.A. CHIN: - - his house?

MR. WALKER: His house.

A.D.A. CHIN: He had a  
house there?

MR. WALKER: He had a  
house.

A.D.A. CHIN: Okay.

MR. WALKER: Yeah.

A.D.A. CHIN: Do remember  
where the house was?

MR. WALKER: No, I can't  
remember.

A.D.A. CHIN: Okay. So all  
right. So you guys part  
ways in Hagerstown,  
Maryland, you meet up with  
him a week after, what  
happens?

MR. WALKER: He came down  
bragging about some

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DAVID WALKER

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shootings and some extra  
money he made up there in  
New York.

A.D.A. CHIN: Okay. Now  
where were you when you - -  
when you saw him?

MR. WALKER: Orangeburg.

A.D.A. CHIN: Okay, where?

MR. WALKER: At my cousin's  
crib, Curtis Nimmons.

A.D.A. CHIN: Curtis  
Nimmons' house?

MR. WALKER: Yes, yeah.

A.D.A. CHIN: Okay. And  
what happened?

MR. WALKER: Uh - -

A.D.A. CHIN: What was - -  
what was he doing while he  
was telling you about doing  
the shootings and making  
some money?

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DAVID WALKER

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MR. WALKER: Who, AB?

A.D.A. CHIN: Yes.

MR. WALKER: Oh, he was bragging, he was jumping around, flexing his ass, making phone calls and stuff like that.

A.D.A. CHIN: Okay. And what happened then?

MR. WALKER: Uh - -

A.D.A. CHIN: What else did he tell you about it?

MR. WALKER: That's it, said he had to pop somebody cause the wrong person got popped, and something about somebody played him on some word, he gotta go back there to see somebody else - - somebody else supposed to get popped and that was

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DAVID WALKER

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probably it, but by that time my cousin came back in the house, he started - - he stopped - - he kind of changed the subject.

A.D.A. CHIN: Okay. Now during this time, how do we - - how did you - - how were you able to know that this - - when he was talking about popping someone, he referred to the homicide we're talking about right now?

MR. WALKER: Because he wanted me to - - he told me if somebody asked me, to make it seem like if I did it and he told me the story.

A.D.A. CHIN: Okay. And



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DAVID WALKER

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what story did he tell you  
to say?

MR. WALKER: That I came to  
New York with him and that  
we went to - - where we  
went to, we went to - - I  
took him to the diamond  
district to go buy a ring  
and which he went and  
bought a ring, say - - told  
me to tell him to go get  
him a hotel room and at the  
hotel room, he told me that  
was me and see - - would  
walk in and that we seen  
somebody pointed out and  
then we shot the person and  
then we left, and he  
supposed to pay me.

A.D.A. CHIN: Okay. Did he  
offer to pay you anything,

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DAVID WALKER

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or any kind of benefit for  
telling this story that he  
told you?

MR. WALKER: Yeah, he said  
he give me ten-thousand  
dollar.

A.D.A. CHIN: And anything  
else?

MR. WALKER: That's it.

A.D.A. CHIN: Okay. Did he  
ever offer you narcotics,  
or anything?

MR. WALKER: No, not on  
this situation.

A.D.A. CHIN: Not on this  
situation?

MR. WALKER: Yeah.

A.D.A. CHIN: So for this  
one, it was just straight  
ten-thousand dollars?

MR. WALKER: Cash, yeah.

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DAVID WALKER

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A.D.A. CHIN: Cash. Did he say anything else to you about the homicide?

MR. WALKER: No, that just basically it.

A.D.A. CHIN: Okay. Did he tell you that what - - why - - why it happened?

MR. WALKER: Yeah, something about he knew the guy and the guy was messing with his girl, and I think he was mad because the person he called the first time to go do the job end up hitting the wrong person.

A.D.A. CHIN: Okay.

MR. WALKER: End up hitting the girl brother, or something like that.

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A.D.A. CHIN: Okay.

MR. WALKER: And then

that's when he end up

having to get in the

situation and had to go get

the right person.

A.D.A. CHIN: Okay. So - -

so he told you that he had

- - he got someone to go -

- to go shoot this person

for him, but apparently

that person shot the wrong

person?

MR. WALKER: Yeah.

A.D.A. CHIN: So he had to

take care of it himself?

MR. WALKER: Yeah.

A.D.A. CHIN: And this was

a person who was messing

with his girlfriend, AB's

girlfriend?

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DAVID WALKER

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MR. WALKER: Yeah, the wife, I think it was his wife, he was married to her.

A.D.A. CHIN: It was AB's wife?

MR. WALKER: I think his wife.

A.D.A. CHIN: Okay. So as far as you know, it was AB's wife?

MR. WALKER: Yeah, I think it was his wife, yeah.

A.D.A. CHIN: Okay. And he told you to say this story, the one that you just repeated about a week or two, or about a week after you saw him again?

MR. WALKER: Yeah, about a week, yep, about a week.

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A.D.A. CHIN: Okay.

MR. WALKER: No more than  
two weeks.

A.D.A. CHIN: Okay. Now  
I'm going to refer you to  
this year now, now around  
in possibly May 17th of  
2018, did you meet up with  
a woman?

MR. WALKER: Yes, sir.

A.D.A. CHIN: Okay. And as  
far as you knew, did this -  
- did this woman ever tell  
you her name?

MR. WALKER: No.

A.D.A. CHIN: Okay. What  
information did this woman  
give you?

MR. WALKER: Give me  
information about Mr.  
Williams and she was asking

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DAVID WALKER

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about a shooting and a  
homicide.

A.D.A. CHIN: Okay. Now  
you - - you told her about  
that homicide, correct?

MR. WALKER: Yes.

A.D.A. CHIN: Okay. And  
what you told her, where  
did you come up with that  
information?

MR. WALKER: From Mr.  
Williams.

A.D.A. CHIN: Okay.

MR. WALKER: I was told  
that if a girl asked, to  
put myself instead of him,  
he didn't want the girl to  
know.

A.D.A. CHIN: Okay. So he  
told you that?

MR. WALKER: Yeah.



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DAVID WALKER

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A.D.A. CHIN: That if - -  
if someone - - that if a  
girl came to ask you about  
- -

MR. WALKER: Yeah, if  
somebody asked - - if  
somebody - - if someone  
asked, to put myself  
instead of him.

A.D.A. CHIN: Okay.

MR. WALKER: Yep.

A.D.A. CHIN: Now did you  
ever open a phone line with  
the numbers starting - -  
with the number of 803-915-  
4437?

MR. WALKER: No, sir.

A.D.A. CHIN: Okay. Did  
you ever use your fiancé's  
information, Kaitlynn  
Kirkland, to open this

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phone line?

MR. WALKER: No, sir.

A.D.A. CHIN: Did you ever  
open a phone line with T-  
Mobile ever?

MR. WALKER: No, sir.

A.D.A. CHIN: Okay.

MR. WALKER: T-Mobile don't  
work where I'm from.

A.D.A. CHIN: Okay. T-  
Mobile doesn't work where  
you're from; where are you  
from?

MR. WALKER: Bamberg, South  
Carolina.

A.D.A. CHIN: Okay. Now I  
showed you this - - which  
is the phone records  
pertaining to that number  
and it has - - do you  
recognize the personal

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information on there,  
correct?

MR. WALKER: Yep.

A.D.A. CHIN: Okay. And  
that is the address and  
that's your fiancé's name?

MR. WALKER: That's wrong,  
because by that time I  
wasn't staying at that  
address.

A.D.A. CHIN: Okay.

MR. WALKER: Yep.

A.D.A. CHIN: But was she  
staying there?

MR. WALKER: Kaitlynn?

A.D.A. CHIN: Yes.

MR. WALKER: No, she stay  
with me.

A.D.A. CHIN: Okay. So at  
that address at that time,  
that - -

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MR. WALKER: Yeah.

A.D.A. CHIN: - - the date  
it's open is May 18th,  
2018, correct, so it's  
about - - that's a day  
after you met with this  
woman from - -

MR. WALKER: Yeah.

A.D.A. CHIN: - - Mr.  
Williams, correct?

MR. WALKER: Well the day  
after I met her, I didn't  
text her.

A.D.A. CHIN: Okay.

MR. WALKER: So that can't  
be me.

A.D.A. CHIN: Okay. But  
what I'm getting at is that  
this phone opened on May  
18th, 2018 - -

MR. WALKER: Yes, sir.

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DAVID WALKER

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A.D.A. CHIN: - - you did  
not open this number?

MR. WALKER: No, sir.

A.D.A. CHIN: Okay. And  
you've never seen this  
number before in your life?

MR. WALKER: No, sir.

A.D.A. CHIN: Okay. Now  
also, I'm showing to you  
and I showed you earlier, a  
series of text messages  
from that phone number of  
803-9915-4437 to another  
individual, correct?

MR. WALKER: Yes, sir.

A.D.A. CHIN: Okay. Now do  
you recognized any of the  
statements made by the  
person that's supposed to  
be from 803-915-4437?

MR. WALKER: No, sir.

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DAVID WALKER

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A.D.A. CHIN: Okay. Were you able to identify different kinds of ways that you write differently?

MR. WALKER: Yeah.

A.D.A. CHIN: Like what?

MR. WALKER: I'm Blood - - I'm Pyru(sp?), so I don't use C's like that, really.

A.D.A. CHIN: Like what?

MR. WALKER: Like cause, he got cause in there instead of because, or just regular buzz, he got convo with a big C and the word okay, I don't use okay, I use the word bet.

A.D.A. CHIN: Okay.

MR. WALKER: Yeah.

A.D.A. CHIN: Uh - -

MR. WALKER: Those are

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DAVID WALKER

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full-fledged sentences; I  
don't write full-fledged  
sentences.

A.D.A. CHIN: Okay. Now do  
you ever use the word like  
da, D-A?

MR. WALKER: No.

A.D.A. CHIN: In replace of  
the?

MR. WALKER: D-A, no.

A.D.A. CHIN: Okay. So what  
you're saying is that you  
have never seen and never  
made any of these text  
messages?

MR. WALKER: Uh-uh.

A.D.A. CHIN: Is that a no?

MR. WALKER: No, sir.

A.D.A. CHIN: Okay. Now  
has Alexander Williams  
contacted you since March



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DAVID WALKER

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2018 of this year?

MR. WALKER: No, not since  
the - - the Lieutenant  
Schneider(sp?) and then  
came and talked to me.

A.D.A. CHIN: Okay.

MR. WALKER: He - -

A.D.A. CHIN: Detective  
Schneider?

MR. WALKER: He sent word  
through another person to  
tell me to fall back, he  
can handle the situation.

A.D.A. CHIN: Okay.

MR. WALKER: And that was  
it.

A.D.A. CHIN: So who did he  
tell to send word?

MR. WALKER: He sent it  
through Travolta, Travolta  
called Devine, Devine told

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DAVID WALKER

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me.

A.D.A. CHIN: Okay,  
Travolta and Devine. Now  
who's Devine?

MR. WALKER: Devine is his  
cousin in Bamberg, South  
Carolina.

A.D.A. CHIN: Okay.

MR. WALKER: Travolta is  
his cousin in Columbia,  
South Carolina.

A.D.A. CHIN: Okay. Now do  
you know what Devine's  
first name is?

MR. WALKER: Dewayne Dokes.

A.D.A. CHIN: Dewayne - -

MR. WALKER: Dokes.

A.D.A. CHIN: Dokes, okay.  
How about Travolta?

MR. WALKER: His first name  
is Sean; I don't know his

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DAVID WALKER

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last name.

A.D.A. CHIN: All right.

And - -

MR. WALKER:

(Unintelligible) - -

A.D.A. CHIN: Okay. They came - - now Devine came to you and told you what, exactly?

MR. WALKER: He asked me, he say like you know, put police protection list, I said, huh, he said yeah, man, Travolta called and said they got you in police protection list, man, say, you hiding or something, I say I'm hiding, Devine like no, man, I can't tell you - - I had to do the same thing, and he like yo, AB

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DAVID WALKER

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told me to tell you, man,  
to fall back, man, he can  
handle the situation.

A.D.A. CHIN: This is after  
you met with Detective  
Schneider, correct?

MR. WALKER: After, yeah.

A.D.A. CHIN: Okay. And  
that happened sometime  
towards the end of this  
summer?

MR. WALKER: Yeah, that  
probably happened about two  
or three weeks after the  
detective and them came.

A.D.A. CHIN: Okay. Now  
after you actually met with  
Detective Schneider and  
there was a Detective  
Hanley, he's like reddish  
hair, shorter?

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MR. WALKER: Yes.

A.D.A. CHIN: Did you ever  
speak with that woman who  
came to see you from - -

MR. WALKER: Yes.

A.D.A. CHIN: - - from - -  
from AB?

MR. WALKER: Yes, I called  
her, the light-skin girl,  
right?

A.D.A. CHIN: Yes.

MR. WALKER: I - - yes, I  
called her and so the  
detectives right here, and  
she was like, why would he  
be out there, and she - -  
she gave me the name,  
Schneider and somebody  
else, and then once I seen  
Schneider and them - - no,  
I called her before that

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DAVID WALKER

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because they came to - -

Lative(sp?)

(unintelligible) was

looking for me and by that time, that's when I called her and said, yo, man, why the police out here, what going on and then when I seen Schneider and them, that's when they told me they heard my conversation with her, that's the last time I talked to her.

A.D.A. CHIN: Okay. That was the last time you ever spoke to her; is that correct?

MR. WALKER: Yes, sir.

A.D.A. CHIN: Okay. Now the other question I have for you is, when you met

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DAVID WALKER

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her, I'm talking about May 17th, 2018, when you met with this woman with that - - was a representative of AB's, did you ever text her after you met with her in person?

MR. WALKER: No, I don't think so.

A.D.A. CHIN: Okay. And then the next contact you had with her was that phone call telling her that - - that the police were there?

MR. WALKER: Yeah.

A.D.A. CHIN: Okay. And did you know that was Detective Schneider?

MR. WALKER: Uh-uh.

A.D.A. CHIN: That's a no?

MR. WALKER: No.



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DAVID WALKER

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A.D.A. CHIN: Okay. She  
gave you the name?

MR. WALKER: Yeah, she gave  
me the name.

A.D.A. CHIN: Okay. Thank  
you very much. This  
concludes the interview.

(END OF RECORDING)

# EXHIBIT – 0

As of: May 05, 2018

*This is NOT a CONSUMER REPORT and does not constitute a "consumer report" under the Fair Credit Reporting Act ("FCRA"). This report may not be used to determine a person's eligibility for credit, insurance, employment or any other purpose regulated under the FCRA.*

Background report for:

**David Demetrio Walker**Born: Nov 1961 (Age: 56)  
Aliases: David Demetrio Walker**WARNING:**

ata is obtained from public records, including court records and other third-party sources. The accuracy and completeness of this information is not guaranteed. All information should be independently verified.

**PROFILE SUMMARY**

As of: May 05, 2018

## CRIMINAL & TRAFFIC RECORDS

**i** A criminal record or police record is a record of a person's criminal history, used to assess his or her trustworthiness. Note that Whitepages is not a consumer reporting agency as defined by the Fair Credit Reporting Act. This means that you cannot use information presented in this website for evaluating a person's eligibility for employment, credit, insurance, housing, and other FCRA governed purposes. The information included in a criminal record and the existence of a criminal record varies between countries and even between jurisdictions within a country. In most cases it lists all non-expunged criminal offenses and may also include traffic offenses such as speeding and drunk-driving. In some countries the record is limited to actual convictions (where the individual has pleaded guilty or been declared guilty by a qualified court), while in others it also includes arrests, charges dismissed, charges pending, and even charges of which the individual has been acquitted.

**24 potential criminal records found for David.**

### MATCH INDICATORS

These show how closely a court record matches with the identity of the person.

First Name	Exact Match
Middle Name	Exact Match
Last Name	Exact Match
Date Of Birth	Marginally Matched
Address	Exact Match
SSN	Not Available On Record



**NO MUGSHOT  
ON RECORD**

### **Criminal Record #1 - 0659-Drugs / Possession Of 28g (1 Oz) Or Less Of Marijuana Or 10g Or Less Of Hash - 1st Offense**

**CHARGE #1 - 0659-DRUGS / POSSESSION OF 28G (1 OZ) OR LESS OF MARIJUANA OR 10G OR LESS OF HASH - 1ST OFFENSE**

**CHARGE DATE: 02/24/2016**

Arrest Date	02/17/2016	Crime County	Orangeburg, Sc
Case Number	H568533	Charges Filed Date	02/24/2016
Case Type	Criminal	Status	Disposed
Disposition	Pled Guilty	Disposition Date	02/29/2016

The records displayed in this report may or may not actually belong to the person you searched for, especially if the person you searched for has a common name. Please exercise caution when viewing court-related records, as they may not be accurate or complete.

As of: May 05, 2018



## MATCH INDICATORS

These show how closely a court record matches with the identity of the person.

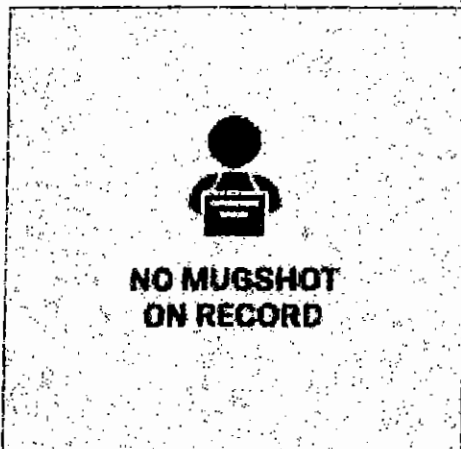
First Name	Exact Match
Middle Name	Exact Match
Last Name	Exact Match
Date Of Birth	Marginally Matched
Address	Exact Match
SSN	Not Available On Record

### Criminal Record #4- Traffic / Speeding, More Than 15 But Less Than 25 Mph Over The Speed Limit

CHARGE #1- TRAFFIC / SPEEDING, MORE THAN 15 BUT LESS THAN 25 MPH OVER THE SPEED LIMIT

CHARGE DATE: 12/18/2014

Arrest Date	12/15/2014	Crime County	Bamberg, Sc
Crime Type	Traffic	Case Number	H044645
Charges Filed Date	12/18/2014	Case Type	Traffic
Disposition	Pled Guilty	Disposition Date	03/11/2015



## MATCH INDICATORS

These show how closely a court record matches with the identity of the person.

First Name	Exact Match
Middle Name	Exact Match
Last Name	Exact Match
Date Of Birth	Exact Match
Address	Exact Match
SSN	Not Available On Record

### Criminal Record #5- 2886-Traffic / Seatbelt Violation - Non-Criminal (+5 more)

CHARGE #1- 2886-TRAFFIC / SEATBELT VIOLATION - NON-CRIMINAL

CHARGE DATE: 04/24/2015

Arrest Date	03/09/2015	Crime County	Bamberg, Sc
Crime Type	Traffic	Case Number	H263065
Charges Filed Date	04/24/2015	Case Type	Traffic
Court	Bamberg Magistrate		

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As of: May 05, 2018



**NO MUGSHOT  
ON RECORD**

**MATCH INDICATORS**

*These show how closely a court record matches with the identity of the person.*

First Name	Exact Match
Middle Name	Exact Match
Last Name	Exact Match
Date Of Birth	Exact Match
Address	Exact Match
SSN	Not Available On Record

**Criminal Record #6- Weapons / Possession Of Firearm Or Ammunition By Person Convicted Of Violent Felony**

**CHARGE #1 - WEAPONS / POSSESSION OF FIREARM OR AMMUNITION BY PERSON CONVICTED OF VIOLENT FELONY**

**CHARGE DATE: 09/28/2010**

Arrest Date	09/22/2010	Crime County	Bamberg, Sc
Case Number	M580207	Charges Filed Date	09/28/2010
Case Type	Criminal-Clerk	Disposition	Prosecutorial Discretion
Disposition Date	02/04/2011		



**NO MUGSHOT  
ON RECORD**

**MATCH INDICATORS**

*These show how closely a court record matches with the identity of the person.*

First Name	Exact Match
Middle Name	Not Matched
Last Name	Exact Match
Date Of Birth	Exact Match
Address	Exact Match
SSN	Not Available On Record

**Criminal Record #7- Weapons / Possession Of Firearm Or Ammunition By Person Convicted Of Violent Felony**

**CHARGE #1 - WEAPONS / POSSESSION OF FIREARM OR AMMUNITION BY PERSON CONVICTED OF VIOLENT FELONY**

**CHARGE DATE: 09/28/2010**

Offense Code	3434	Crime County	Bamberg, Sc
Crime Type	Felony	Case Number	M580207WALDAV
Charges Filed Date	09/28/2010	Case Type	Felony F
Court	Sc Bamberg County Circuit Court		

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As of: May 05, 2018

# MATCH INDICATORS

These show how closely a court record matches with the identity of the person.

First Name	Exact Match
Middle Name	Not Matched
Last Name	Exact Match
Date Of Birth	Exact Match
Address	Exact Match
SSN	Not Available On Record

NO MUGSHOT  
ON RECORD

## Criminal Record #10- Resisting / Resisting Arrest, Oppose, Resist, Or Assault Law Enforcement Officer Serving Process (+1 more)

CHARGE #1- RESISTING / RESISTING ARREST, OPPOSE, RESIST, OR ASSAULT LAW ENFORCEMENT OFFICER  
SERVING PROCESS

CHARGE DATE: 12/06/2002

Offense Code	0326	Arrest Date	12/05/2002
Crime County	Bamberg, Sc	Crime Type	Misdemeanor
Case Number	G821851	Charges Filed Date	12/06/2002
Case Type	Criminal-Clerk	Court	Sc Bamberg County Circuit Court
Sentence	Nol Pros Per Ple	Disposition	Nolle Prosequi
Disposition Date	10/30/2003		

CHARGE #2- MINOR / CONTRIBUTING TO THE DELINQUENCY OF A MINOR

CHARGE DATE: 12/06/2002

Offense Code	0048	Arrest Date	12/05/2002
Crime County	Bamberg, Sc	Crime Type	Misdemeanor
Case Number	G821459	Charges Filed Date	12/06/2002
Case Type	Criminal-Clerk	Court	Sc Bamberg County Circuit Court
Sentence	2 Yrs-Concurrent	Disposition	Pled Guilty
Disposition Date	10/30/2003		

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As of: May 05, 2018



#### MATCH INDICATORS

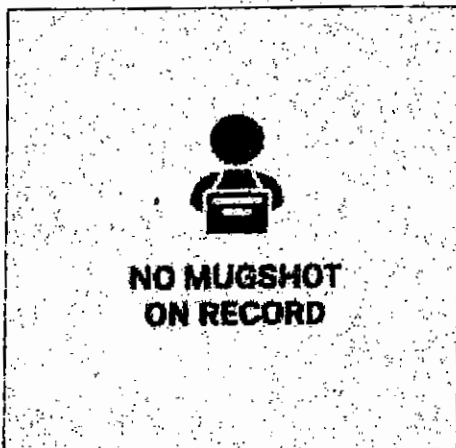
These show how closely a court record matches with the identity of the person.

First Name	Exact Match
Middle Name	Not Matched
Last Name	Exact Match
Date Of Birth	Exact Match
Address	City No Match
	State No Match
	County No Match
	Zip Matched
SSN	Not Available On Record

#### Criminal Record #12- Robbery / Common Law Robbery, Strong Arm Robbery

CHARGE #1 - ROBBERY / COMMON LAW ROBBERY, STRONG ARM ROBBERY CHARGE DATE: 02/11/2002

Offense Code	0137	Arrest Date	02/08/2002
Crime County	Bamberg, Sc	Crime Type	Felony
Case Number	G673453	Charges Filed Date	02/11/2002
Case Type	Criminal-Clerk	Court	Sc Bamberg County Circuit Court
Sentence	10 Yrs-Credit Fo	Disposition	Pled Guilty
Disposition Date	04/11/2003		



#### MATCH INDICATORS

These show how closely a court record matches with the identity of the person.

First Name	Exact Match
Middle Name	Not Matched
Last Name	Exact Match
Date Of Birth	Exact Match
Address	Not Available On Record
SSN	Not Available On Record

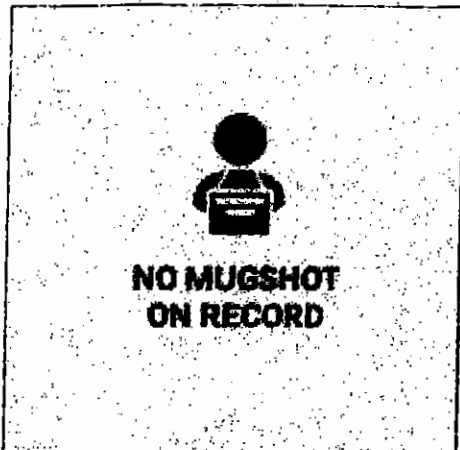
#### Criminal Record #13- Speeding

CHARGE #1 - SPEEDING CHARGE DATE: 04/01/2003

Crime County	Weber, Ut	Case Number	677696
Charges Filed Date	04/01/2003	Case Type	Mc
Court	Ogden District		

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As of: May 05, 2018



### MATCH INDICATORS

These show how closely a court record matches with the identity of the person.

First Name	Exact Match
Middle Name	Exact Match
Last Name	Exact Match
Date Of Birth	Exact Match
Address	City No Match State No Match County No Match Zip Matched
SSN	Not Available On Record

### Criminal Record #15- 2886-Violation Seat Belt Law (+1 more)

#### CHARGE #1 - 2886-VIOLATION SEAT BELT LAW

CHARGE DATE: 04/18/2001

Arrest Date	04/13/2001	Crime County	Orangeburg, Sc
Crime Type	Traffic	Case Number	Y618052
Charges Filed Date	04/18/2001	Case Type	Traffic
Status	Disposed	Disposition	Guilty Bench Trial
Disposition Date	05/03/2001		

#### CHARGE #2 - 2100-64/55

CHARGE DATE: 04/18/2001

Arrest Date	04/13/2001	Crime County	Orangeburg, Sc
Crime Type	Traffic	Case Number	Y618051
Charges Filed Date	04/18/2001	Case Type	Traffic
Status	Disposed	Disposition	Guilty Bench Trial
Disposition Date	05/03/2001		

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As of: May 05, 2018

**MATCH INDICATORS**

*These show how closely a court record matches with the identity of the person.*

First Name	Exact Match
Middle Name	Not Matched
Last Name	Exact Match
Date Of Birth	Not Available On Record
Address	City No Match
	State No Match
	County No Match
	Zip Matched
SSN	Not Available On Record

**NO MUGSHOT  
ON RECORD**

**Criminal Record #18- Fraudulent Check,**

**CHARGE #1- FRAUDULENT CHECK,**

**CHARGE DATE: 05/14/1999**

Offense Code	0670	Crime County	Greenville, Sc
Crime Type	Misdemeanor	Case Number	E147787WALDAV
Charges Filed Date	05/14/1999	Case Type	Misdemeanor U
Court	Sc Greenville County Summary Dockets	Sentence	30 Days Or 14500
Disposition	Tia Guilty Bench Trial	Disposition Date	06/11/1999